NPDES
INSPECTION REPORT

CITY OF ABERDEEN, ID
WASTEWATER TREATMENT FACILITY

March 12, 2012

Prepared by:
David Domingo
NPDES Compliance Unit
Office of Compliance and Enforcement
Environmental Protection Agency, Region 10

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Richard Mayer who is the Public Works Director for the City of Aberdeen, ID). Mr. Mayer is the certified, lead operator for the City's wastewater treatment plant.

I. Facility Information

Facility Name:	City of Aberdeen, ID Wastewater Treatment Plant (Facility)
Facility Type:	Sewage Treatment Plant
Facility Location:	2695 West 1750 South Aberdeen, ID 83210 Latitude: +42.9416 Longitude: -112.8375
Mailing Address:	33 North Main Aberdeen, ID 83210
Facility Contacts:	Richard Mayer, Public Works Director
Facility Numbers:	Ph: (208) 397-4161 (City Hall) Fax: (208) 397-3431
Permit Number:	ID-002017-6
Permit Status:	The current permit became effective September 26, 2001 and expired on September 26, 2006. The City reapplied in September 2006 and the permit is administratively extended.
SIC Code:	4952

II. Inspection Information

Inspection Date/Time:	March 12, 2012	9:15 AM to 2:15 PM
Inspectors:	David Domingo (EPA), Craig Borrenpohl (IDEQ, Pocatello) and Wayne Crowther (IDEQ, Pocatello)	
Weather:	Sunny	
Purpose:	Determination of compliance with the NPDES Permit and the Clean Water Act	

III. Inspection Entry

This was an announced inspection. Mr. Richard Mayer, Public Works Director, was contacted the week prior to the March 12th inspection date and emailed a copy of the status report developed by EPA (see Attachment C).

I met Mr. Mayer at City Hall at approximately 9:00 AM.

I presented my credentials and discussed the purpose of the visit with Mr. Mayer prior to the inspection. I was not denied access to the Facility.

I was accompanied throughout the inspection by Mr. Mayer.

IV. Inspection Chronology

On March 12, 2012, the inspection began with an entry interview, followed by a file review and tour of the Facility which is located on the east side of the City at 2695 West 1750 South (see Attachment A). The Facility tour included an inspection of the treatment units and a review of the sample collection and analytical procedures at the onsite laboratory. As part of the file review, the Facility's quality assurance plan (QAP), the operation and maintenance (O&M) manual and discharge monitoring reports (DMRs) were reviewed. Mr. Mayer is the lead, certified operator responsible for sample collection and onsite analysis. Mr. Mayer is also responsible for filling out and signing the DMRs.

The inspection then concluded with an exit interview where I pointed out the areas of concern I observed during the inspection.

V. Owner and Operator Information

The Facility is currently owned and operated by the City of Aberdeen, Idaho.

VI. Background

The permit authorizes the Facility to discharge through outfall 001 to Aberdeen Drain which flows to American Falls Reservoir. Based on the September 2006 permit reapplication submitted by the City, the Facility receives wastewater primarily from local residents and commercial establishments. The current service population is approximately 1,827 and the Facility has a design flow of 0.6 million gallons per day (MGD) and an actual annual average daily flow of 0.477 MGD

The collection system is 100% separated sanitary sewer.

VII. Waste Management Process

The Facility is a mechanical treatment plant in which influent flows through a comminutor, Parshall flume and then through a pair of screw pumps. Wastewater then flows through a circular rotating fine screen, ABF tower, aeration basin, secondary clarifier and chlorine disinfection prior to discharging to the Aberdeen Drain. According to Mr. Mayer, the final filters have never been used as part of the treatment process since he began working at the Facility in the 1990's.

At the time of inspection, all treatment units were operational. See Attachment B for photo documentation of the units.

VIII. Facility Sample Collection and Analyses

The sample collection and onsite analyses are conducted by several individuals including Mr. Mayer.

The parameters analyzed onsite using monitoring equipment include flow, pH, total residual chlorine (TRC), temperature and dissolved oxygen.

Biochemical oxygen demand (BOD), total suspended solids (TSS), total ammonia, nitrate-nitrite, total kjeldahl nitrogen, total phosphate and *Escherichia coli* (E. coli) analyses for samples collected from the Facility are analyzed by an outside laboratory (i.e. IAS Enviro-Chem, 3314 Poleline Road, Pocatello, ID 83201 Ph: (208) 237-3300.

See Attachment B for photo documentation of the City's QAP.

IX. Areas of Concern

This inspection included a review of the treatment system, the sample collection and analyses procedures, and documentation required by the Permit. During the course of this inspection, I observed and identified the following areas of concern:

A. Part I.A (Table 1) of the Permit specifies that the permittee must sample for biochemical oxygen demand (BOD), total suspended solids (TSS), total ammonia, nitrate-nitrite and total phosphorus by collecting 24-hour composite samples. Part VI of the Permit specifies that a "24-hour composite" sample shall mean a flow proportioned mixture of not less than eight discrete aliquots. At the time of the inspection, the City was collecting time proportioned samples (i.e. ~ 100-150 ml every hour). My concern is the City was not collecting flow proportioned 24-hour composite samples as specified in Part I.A of the Permit.

B. Quality Assurance Plan (QAP) Part I.D of the Permit specifies that the permittee develop and implement a quality assurance plan (QAP) for all monitoring required by the Permit. At a minimum, the QAP must include the following:

a. Protocols for sampling techniques (field blanks, replicates, duplicates, control samples, etc.),
b. Sample preservation methods,
c. Sample shipment procedures,
d. Instrument calibration procedures and preventive maintenance (frequency, standard, spare parts), and
e. Qualification and training of personnel.

In addition, the permittee must use the EPA approved quality assurance/quality control (QA/QC) and chain-of-custody procedures described in *EPA's Requirements for Quality Assurance Project Plans, EPA-QA/R-5* and *Guidance for Quality Assurance Project Plans, EPA QA/G-5*. At the time of the inspection, the following deficiencies were noted regarding the QAP:

a. Sample preservation temperatures are not consistent with the most recent EPA approved methods (i.e. $\leq$ 6°C for BOD, TSS, NH_3... or $\leq$ 10°C for E. coli but not frozen).
b. The correct EPA approved method, detection limit and holding time for E. coli were not identified (i.e. EPA 1103.1, 1 CFU / 100 ml and 6 hours).
c. Sample preservation must include pH < 2 in addition to H_2SO_4 for NH_3, TP, NO_3…
d. The correct EPA approved method detection limit for dissolved oxygen was not identified (i.e. 0.1 mg/l for membrane electrode method).
e. Protocols for sampling techniques for onsite analysis of pH, TRC, temperature and dissolved oxygen were not included.

In addition, the City did not retain chain-of-custody forms for samples sent to the contract laboratory as required in Part III.F of the Permit.

My concerns are that the QAP did not include all the requirements specified in Part I.D of the Permit, the City did follow EPA approved chain-of-custody procedures for sample collection, handling and preservation prior to transport to the treatment plant and the City failed to retain records of all monitoring information (i.e. chain-of-custody forms) as specified in Part III.F of the Permit. Consequently, the City cannot adequately demonstrate that they are following EPA approved methods as required in Part III.B of the Permit (e.g., samples received within specified holding times and sample preservation temperatures). Furthermore, the sample results may not be representative of the volume and nature of the monitored discharge pursuant to Part III.A of the Permit.

C. Operation and Maintenance Plan Part I.E of the Permit specifies that within 120 days after the effective date of the Permit, the permittee develop an Operation and Maintenance plan and ensure that it includes appropriate Best Management Practices

(BMPs). BMPs must include measures that prevent or minimize the potential for the release of pollutants to American Falls Reservoir. The plan shall be retained on site and made available to EPA upon request. At the time of the inspection, no BMPs were specified in the plan. My concern is that the plan does not include all the requirements specified in Part I.E of the Permit.

D. Design Criterion Part I.E.3 of the Permit specifies that the permittee must compute an annual average value for flow entering the facility based on the previous twelve months data. If the average annual value exceeds 85% of the design criterion value, the permittee must develop a facility plan and schedule within one year from the date of the first exceedance. At the time of the inspection, the City was comparing monthly flow values to the 85% threshold (i.e. 0.51 MGD) instead of actually calculating the annual average flow based upon the previous twelve months data. My concern is that the City was not calculating the annual average flow as specified in Part I.E.3 of the Permit.

E. Reporting of Monitoring Results Parts III.B and V.E of the Permit specify that the permittee must summarize monitoring results each month on the DMR and sign and certify that the DMRs are true, accurate and complete. At the time of the inspection, the February 2012 DMR was reviewed along with the corresponding analytical data (i.e., operator's daily log book, certificate of analysis…). The following deficiencies were noted:

   a. Monthly average BOD and TSS loadings were calculated using the average monthly flow instead of the corresponding flow on the days sampling occurred.
   b. TRC weekly average was reported as 1.83 lb/day, however the highest weekly average was 1.65 lb/day.
   c. TRC weekly average calculations for the first and last weeks of the month did not include all monitoring results within the calendar week. The calculations for these two weeks incorporated monitoring results within the calendar month (i.e. weekly average for the first week was based on concentration and loadings results for February 1-3; weekly average for the last week was based on concentration and loadings results for February 27-29).
   d. E. coli result for February 1, 2012 was not included in the monthly benchsheet and in the monthly geometric mean calculation.

   My concern is that the City failed to submit true, accurate and complete DMRs as required in Parts III.B and V.E of the Permit.

F. Signatory Requirements Part V.E of the Permit specifies that all reports required by the Permit and other information requested by the Director shall be signed by the ranking elected official (i.e. mayor) or by a duly authorized representative of that person. At the time of the inspection, Mr. Mayer had signed the 2006 permit application and the monthly DMRs. The City and EPA have no written authorization

stating Mr. Mayer as a duly authorized representative. My concern is the permittee has not provided written authorization as specified in Part V.E of the Permit.

G. Operation and Maintenance Part IV.E of the Permit specifies that the permittee must at all times properly operate and maintain all facilities and systems of treatment and control. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. The 7.0 and 10.0 pH buffers used to calibrate the onsite pH meter had an expiration date of February 2012 and February 2011, respectively. In addition, the temperature of the influent and effluent composite samplers is not recorded; therefore the City cannot demonstrate proper sample preservation (i.e. $\leq$ 6°C) while composite samples are collected. My concern is that the City did not follow appropriate quality assurance procedures in accordance with Part IV.E of the Permit. Furthermore, this failure may have lead to samples results that are not representative of the nature and flow of the discharge as required in Part III.A of the Permit.

X. Additional Observations

A. Reporting of Monitoring Results Part I.A of the Permit specifies weekly averages for BOD, TSS and TRC. The City has not clearly defined a calendar week (e.g. Monday to Sunday; Saturday to Friday, etc.) to assist in calculating weekly averages for these parameters.

B. Representative Sampling Part III.A of the Permit specifies samples and measurements must be representative of the volume and nature of the discharge. At the time of the inspection, I noted that total residual chlorine meter currently used at the Facility may not provide a representative measurement.

C. Noncompliance Reporting Part II.H of the Permit specifies that the permittee must report all instances of noncompliance, not required to be reported within 24 hours, at the time the DMRs are submitted. During the inspection, I explain to Mr. Mayer how this condition applies to the deficiencies noted above and that the City must submit a written notice with the DMR in accordance with Part II.H of the Permit.

D. Inconsistencies in Permit and preprinted DMRs Part I.A of the Permit currently on EPA Region 10's website specifies a weekly average limit of 200 / 100 ml and sample frequency of 5/week (Monday – Friday). The City provided copies of the signed Permit and previous correspondence from EPA (dated September 26, 2001 and February 27, 2002) which indicated a compliance schedule for TRC has been added, E. coli monitoring has been revised, fecal coliform is no longer required and units of measure for TRC should be mg/l not µg/l. The signed Permit and preprinted DMRs used by the City have µg/l for TRC. The preprinted DMRs have the weekly average limit and monitoring for fecal coliform.

XI. Inspection Sampling

Samples were not collected by EPA at the time of this inspection.

Report Completion Date: 3/28/12

Lead Inspector Signature: David L Dang

ATTACHMENT A

Aerial Photographs

City of Aberdeen, Idaho
Wastewater Treatment Facility

(March 12, 2012 Inspection)

Aerial photograph of the City of Aberdeen, ID wastewater treatment plant. Facility is located on the east side of the city and discharges effluent to the Aberdeen Drain which flows into American Reservoir.

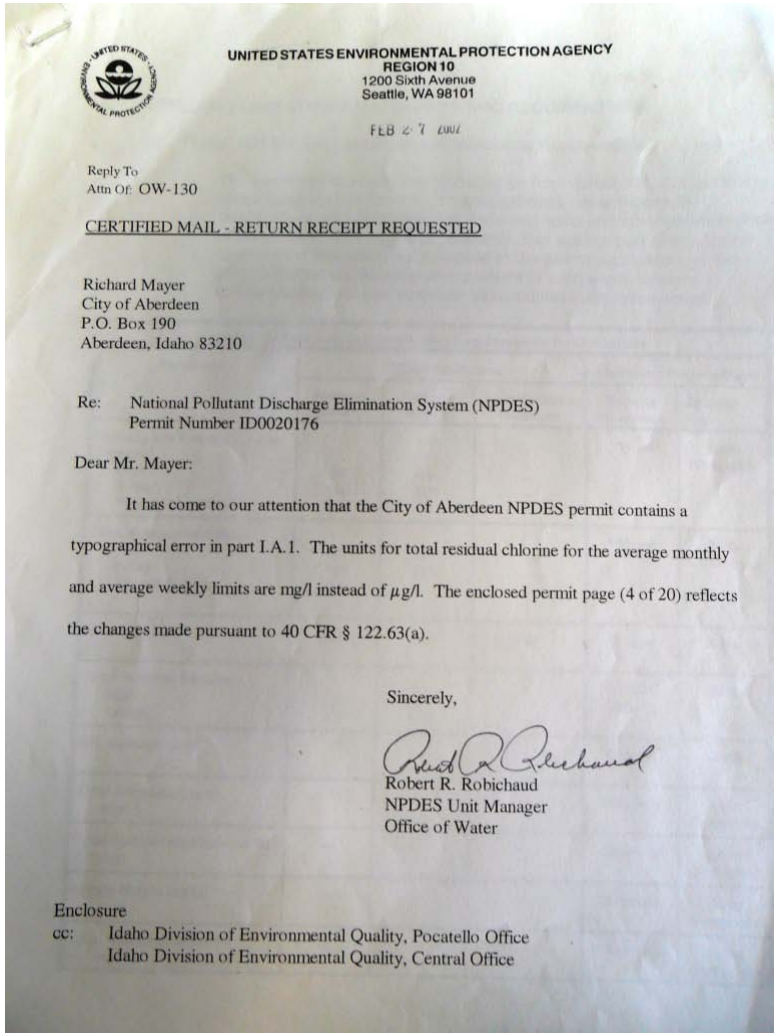
Aerial photograph of the City of Aberdeen, ID wastewater treatment plant. Facility is located on the east side of the city and discharges effluent to the Aberdeen Drain which flows into American Reservoir.

ATTACHMENT B

Photograph Documentation

City of Aberdeen, Idaho
Wastewater Treatment Facility

(March 12, 2012 Inspection)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

FEB 27 2002

Reply To
Attn Of: OW-130

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Richard Mayer
City of Aberdeen
P.O. Box 190
Aberdeen, Idaho 83210

Re: National Pollutant Discharge Elimination System (NPDES)
Permit Number ID0020176

Dear Mr. Mayer:

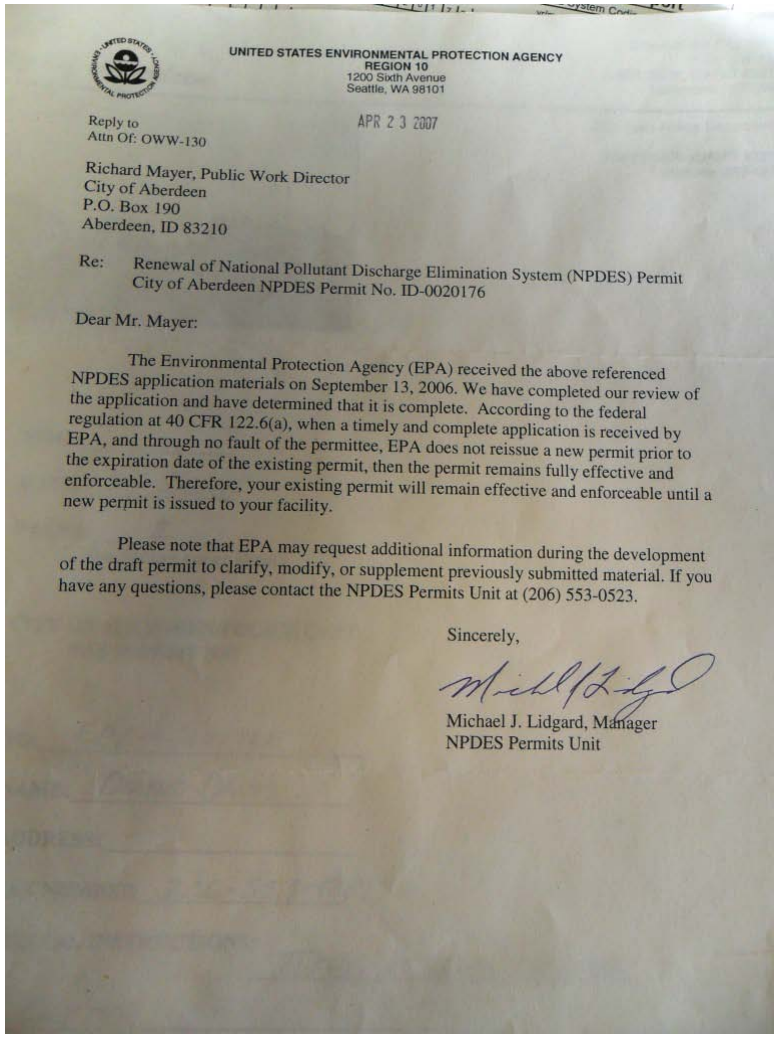
It has come to our attention that the City of Aberdeen NPDES permit contains a typographical error in part I.A.1. The units for total residual chlorine for the average monthly and average weekly limits are mg/l instead of µg/l. The enclosed permit page (4 of 20) reflects the changes made pursuant to 40 CFR § 122.63(a).

Sincerely,

Robert R. Robichaud
NPDES Unit Manager
Office of Water

Enclosure
cc: Idaho Division of Environmental Quality, Pocatello Office
Idaho Division of Environmental Quality, Central Office

Photograph by David Domingo (EPA) on March 12, 2012 looking at the February 27, 2002 letter from EPA stating that the unit of measure for the average monthly and average weekly concentration limits for total residual chlorine is mg/l not µg/l.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply to
Attn Of: OWW-130

APR 23 2007

Richard Mayer, Public Work Director
City of Aberdeen
P.O. Box 190
Aberdeen, ID 83210

Re: Renewal of National Pollutant Discharge Elimination System (NPDES) Permit
City of Aberdeen NPDES Permit No. ID-0020176

Dear Mr. Mayer:

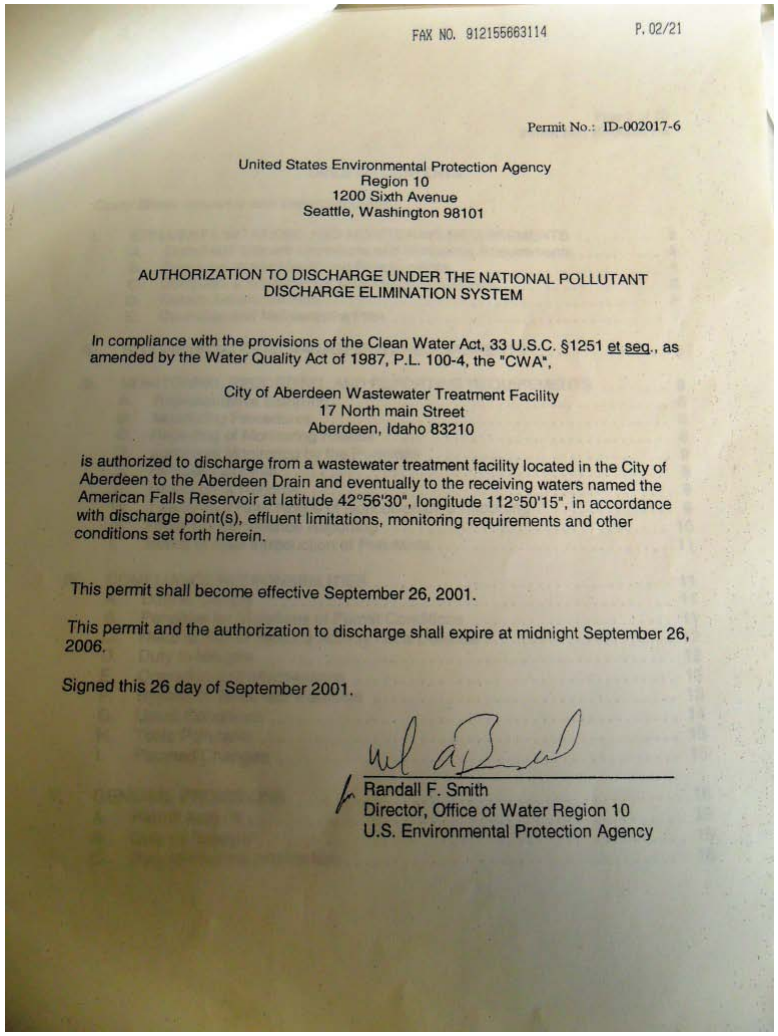
The Environmental Protection Agency (EPA) received the above referenced NPDES application materials on September 13, 2006. We have completed our review of the application and have determined that it is complete. According to the federal regulation at 40 CFR 122.6(a), when a timely and complete application is received by EPA, and through no fault of the permittee, EPA does not reissue a new permit prior to the expiration date of the existing permit, then the permit remains fully effective and enforceable. Therefore, your existing permit will remain effective and enforceable until a new permit is issued to your facility.

Please note that EPA may request additional information during the development of the draft permit to clarify, modify, or supplement previously submitted material. If you have any questions, please contact the NPDES Permits Unit at (206) 553-0523.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

Photograph by David Domingo (EPA) on March 12, 2012 looking at a the September 26, 2001 fax from EPA indicating the changes to the final final which include the addition of a compliance schedule in Part I.C, revision to the sample frequency for E. coli and deletion of fecal coliform monitoring.



FAX NO. 912155663114 P. 02/21

Permit No.: ID-002017-6

United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Clean Water Act, 33 U.S.C. §1251 et seq., as amended by the Water Quality Act of 1987, P.L. 100-4, the "CWA",

City of Aberdeen Wastewater Treatment Facility
17 North main Street
Aberdeen, Idaho 83210

is authorized to discharge from a wastewater treatment facility located in the City of Aberdeen to the Aberdeen Drain and eventually to the receiving waters named the American Falls Reservoir at latitude 42°56'30", longitude 112°50'15", in accordance with discharge point(s), effluent limitations, monitoring requirements and other conditions set forth herein.

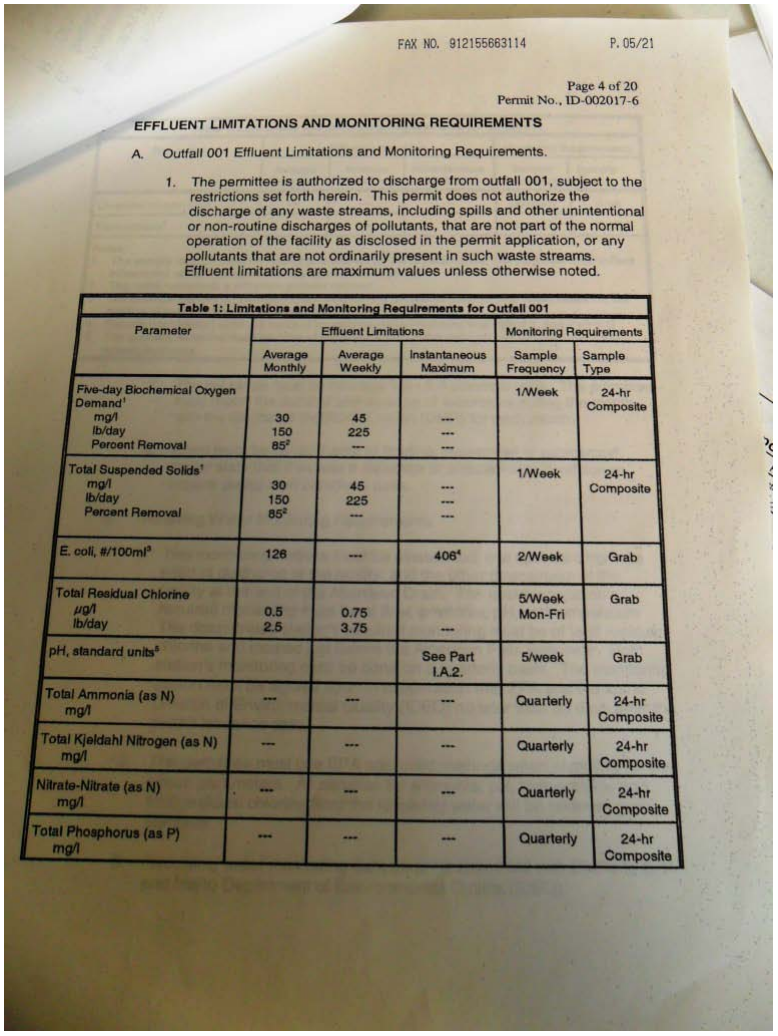
This permit shall become effective September 26, 2001.

This permit and the authorization to discharge shall expire at midnight September 26, 2006.

Signed this 26 day of September 2001.

Randall F. Smith
Director, Office of Water Region 10
U.S. Environmental Protection Agency

Photograph by David Domingo (EPA) on March 12, 2012 looking at the signatory page for the final permit.



FAX NO. 912155663114 P. 05/21

Page 4 of 20
Permit No., ID-002017-6

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

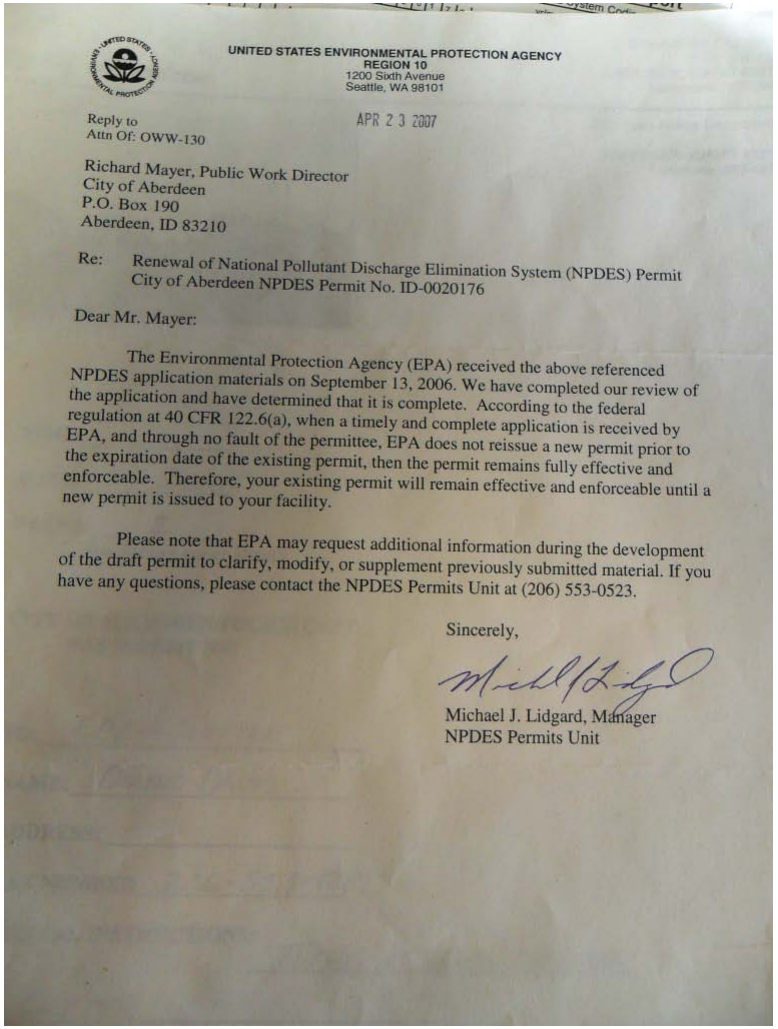
A. Outfall 001 Effluent Limitations and Monitoring Requirements.

1. The permittee is authorized to discharge from outfall 001, subject to the restrictions set forth herein. This permit does not authorize the discharge of any waste streams, including spills and other unintentional or non-routine discharges of pollutants, that are not part of the normal operation of the facility as disclosed in the permit application, or any pollutants that are not ordinarily present in such waste streams. Effluent limitations are maximum values unless otherwise noted.

Table 1: Limitations and Monitoring Requirements for Outfall 001

Parameter	Effluent Limitations			Monitoring Requirements	
	Average Monthly	Average Weekly	Instantaneous Maximum	Sample Frequency	Sample Type
Five-day Biochemical Oxygen Demand[1] mg/l lb/day Percent Removal	 30 150 85[2]	 45 225 ---	 --- --- ---	1/Week	24-hr Composite
Total Suspended Solids[1] mg/l lb/day Percent Removal	 30 150 85[2]	 45 225 ---	 --- --- ---	1/Week	24-hr Composite
E. coli, #/100ml[3]	126	---	406[4]	2/Week	Grab
Total Residual Chlorine µg/l lb/day	 0.5 2.5	 0.75 3.75	 ---	5/Week Mon-Fri	Grab
pH, standard units[5]			See Part I.A.2.	5/week	Grab
Total Ammonia (as N) mg/l	---	---	---	Quarterly	24-hr Composite
Total Kjeldahl Nitrogen (as N) mg/l	---	---	---	Quarterly	24-hr Composite
Nitrate-Nitrate (as N) mg/l	---	---	---	Quarterly	24-hr Composite
Total Phosphorus (as P) mg/l	---	---	---	Quarterly	24-hr Composite

Photograph by David Domingo (EPA) on March 12, 2012 looking at Table 1 of the final permit. Note the sample frequency for E. coli is two times per week and fecal coliform monitoring is not required.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply to
Attn Of: OWW-130

APR 23 2007

Richard Mayer, Public Work Director
City of Aberdeen
P.O. Box 190
Aberdeen, ID 83210

Re: Renewal of National Pollutant Discharge Elimination System (NPDES) Permit
City of Aberdeen NPDES Permit No. ID-0020176

Dear Mr. Mayer:

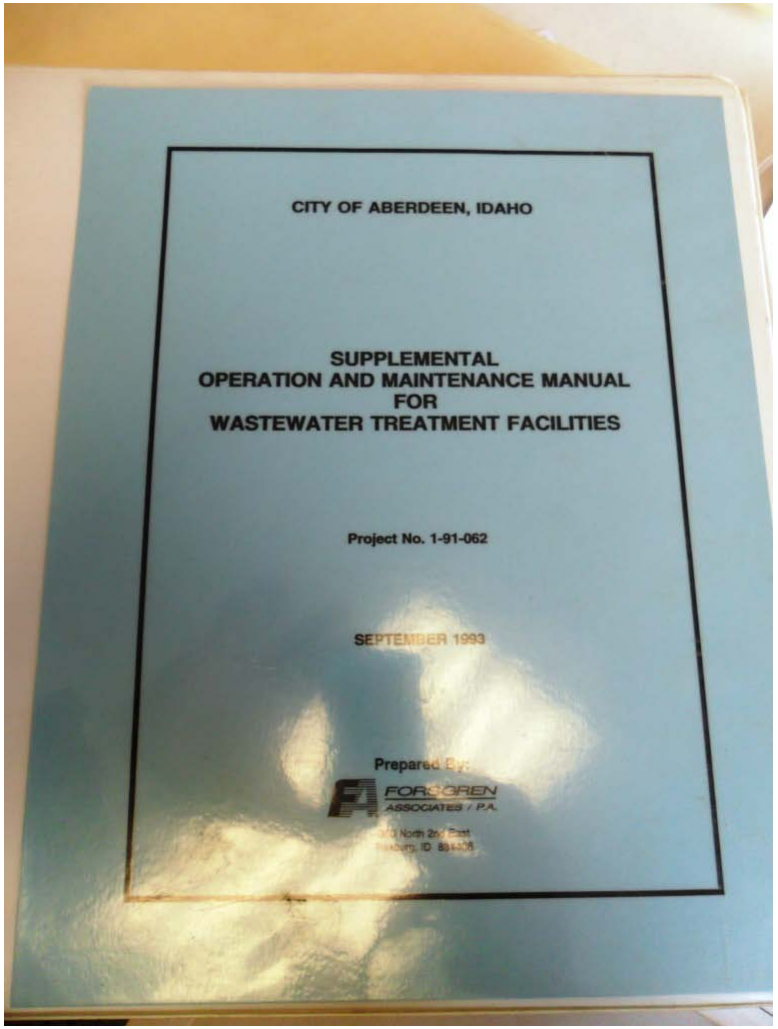
The Environmental Protection Agency (EPA) received the above referenced NPDES application materials on September 13, 2006. We have completed our review of the application and have determined that it is complete. According to the federal regulation at 40 CFR 122.6(a), when a timely and complete application is received by EPA, and through no fault of the permittee, EPA does not reissue a new permit prior to the expiration date of the existing permit, then the permit remains fully effective and enforceable. Therefore, your existing permit will remain effective and enforceable until a new permit is issued to your facility.

Please note that EPA may request additional information during the development of the draft permit to clarify, modify, or supplement previously submitted material. If you have any questions, please contact the NPDES Permits Unit at (206) 553-0523.

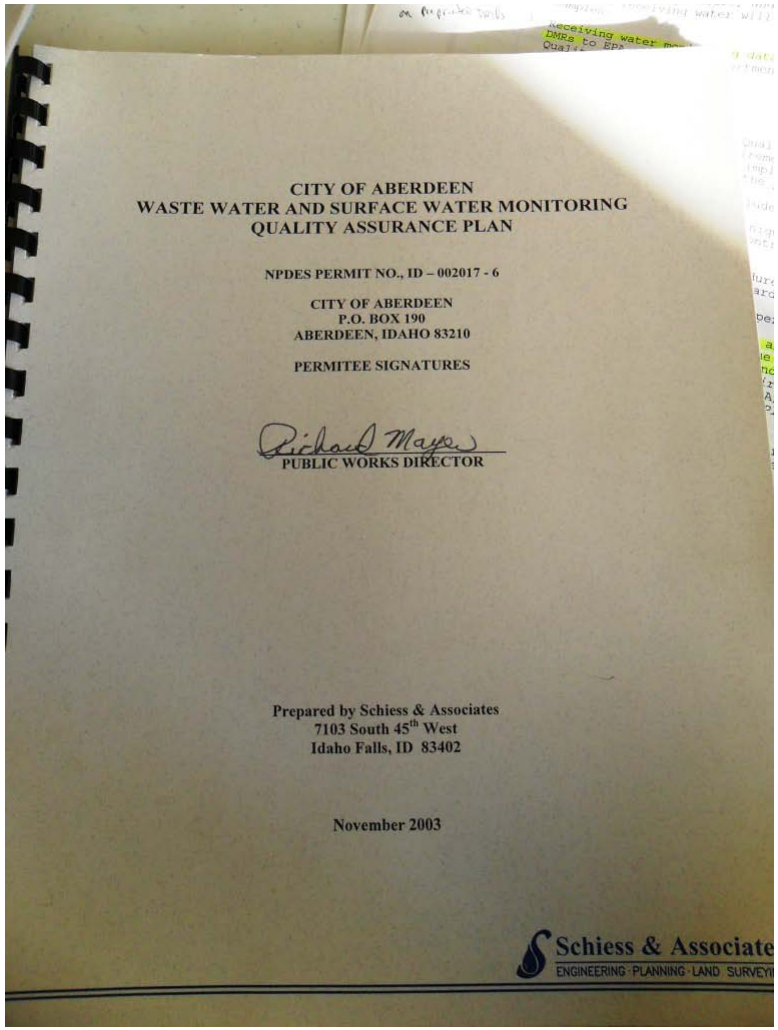
Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

Photograph by David Domingo (EPA) on March 12, 2012 looking at the April 23, 2007 letter from EPA stating that the permit is administratively extended.



Photograph by David Domingo (EPA) on March 12, 2012 looking at the operation and maintenance manual for the Facility.



CITY OF ABERDEEN
WASTE WATER AND SURFACE WATER MONITORING
QUALITY ASSURANCE PLAN

NPDES PERMIT NO., ID – 002017 - 6

CITY OF ABERDEEN
P.O. BOX 190
ABERDEEN, IDAHO 83210

PERMITEE SIGNATURES

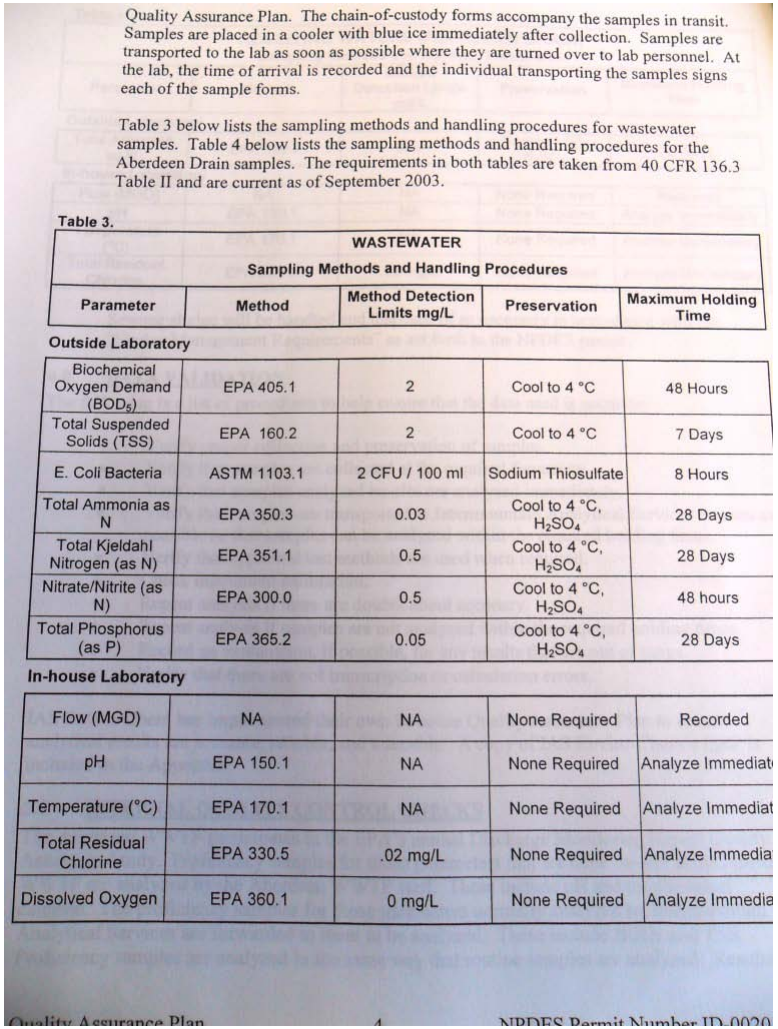
Richard Mayer
PUBLIC WORKS DIRECTOR

Prepared by Schiess & Associates
7103 South 45th West
Idaho Falls, ID 83402

November 2003

Schiess & Associate
ENGINEERING · PLANNING · LAND SURVEYI

Photograph by David Domingo (EPA) on March 12, 2012 looking at the QAP for the Facility.



Quality Assurance Plan. The chain-of-custody forms accompany the samples in transit. Samples are placed in a cooler with blue ice immediately after collection. Samples are transported to the lab as soon as possible where they are turned over to lab personnel. At the lab, the time of arrival is recorded and the individual transporting the samples signs each of the sample forms.

Table 3 below lists the sampling methods and handling procedures for wastewater samples. Table 4 below lists the sampling methods and handling procedures for the Aberdeen Drain samples. The requirements in both tables are taken from 40 CFR 136.3 Table II and are current as of September 2003.

Table 3.

WASTEWATER
Sampling Methods and Handling Procedures

Parameter	Method	Method Detection Limits mg/L	Preservation	Maximum Holding Time
Outside Laboratory				
Biochemical Oxygen Demand (BOD_5)	EPA 405.1	2	Cool to 4 °C	48 Hours
Total Suspended Solids (TSS)	EPA 160.2	2	Cool to 4 °C	7 Days
E. Coli Bacteria	ASTM 1103.1	2 CFU / 100 ml	Sodium Thiosulfate	8 Hours
Total Ammonia as N	EPA 350.3	0.03	Cool to 4 °C, H_2SO_4	28 Days
Total Kjeldahl Nitrogen (as N)	EPA 351.1	0.5	Cool to 4 °C, H_2SO_4	28 Days
Nitrate/Nitrite (as N)	EPA 300.0	0.5	Cool to 4 °C, H_2SO_4	48 hours
Total Phosphorus (as P)	EPA 365.2	0.05	Cool to 4 °C, H_2SO_4	28 Days
In-house Laboratory				
Flow (MGD)	NA	NA	None Required	Recorded
pH	EPA 150.1	NA	None Required	Analyze Immediat
Temperature (°C)	EPA 170.1	NA	None Required	Analyze Immediat
Total Residual Chlorine	EPA 330.5	.02 mg/L	None Required	Analyze Immedia
Dissolved Oxygen	EPA 360.1	0 mg/L	None Required	Analyze Immedia

Quality Assurance Plan 4 NPDES Permit Number ID-0020

Photograph by David Domingo (EPA) on March 12, 2012 looking at Table 3 of the QAP. Note the sample preservation temperatures are not consistent with the most recent EPA approved methods (i.e. $\leq 6°$ for BOD, TSS... or $\leq 10°C$ for E. coli). Also, the correct EPA approved method, detection limit and holding time for E. coli are EPA 1103.1, 1 CFU / 100 ml and 6 hours, respectively. Sample preservation must include pH < 2 in addition to H_2SO_4.

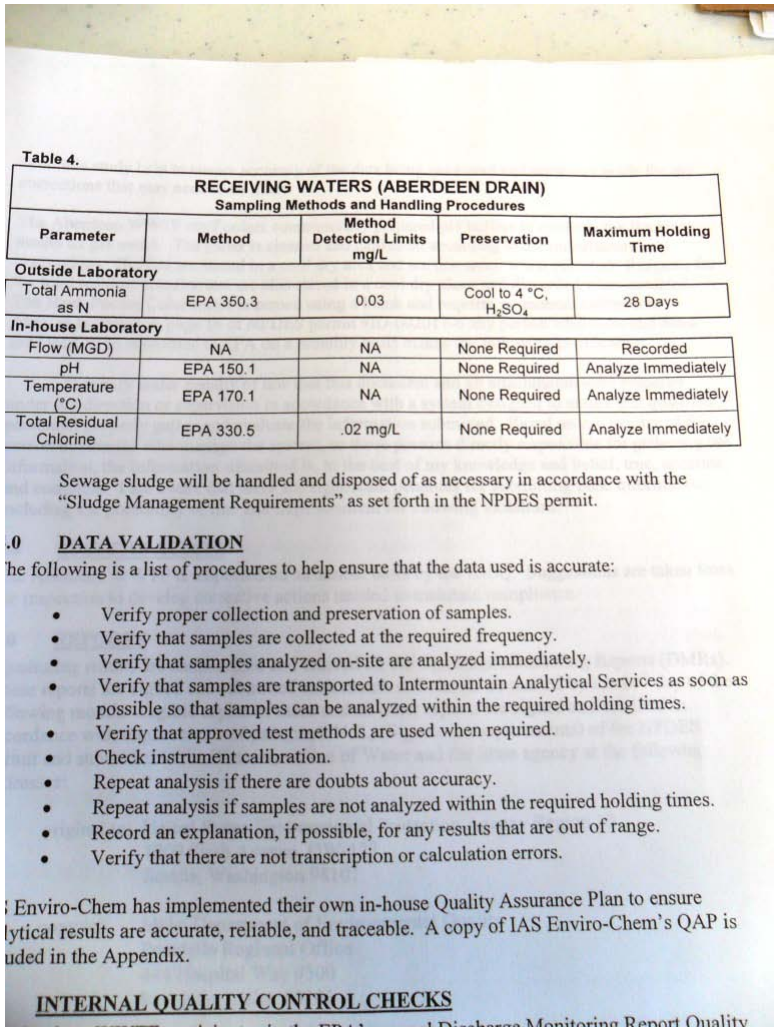


Table 4.

RECEIVING WATERS (ABERDEEN DRAIN) Sampling Methods and Handling Procedures				
Parameter	**Method**	**Method Detection Limits mg/L**	**Preservation**	**Maximum Holding Time**
Outside Laboratory				
Total Ammonia as N	EPA 350.3	0.03	Cool to 4 °C, H_2SO_4	28 Days
In-house Laboratory				
Flow (MGD)	NA	NA	None Required	Recorded
pH	EPA 150.1	NA	None Required	Analyze Immediately
Temperature (°C)	EPA 170.1	NA	None Required	Analyze Immediately
Total Residual Chlorine	EPA 330.5	.02 mg/L	None Required	Analyze Immediately

Sewage sludge will be handled and disposed of as necessary in accordance with the "Sludge Management Requirements" as set forth in the NPDES permit.

.0 DATA VALIDATION

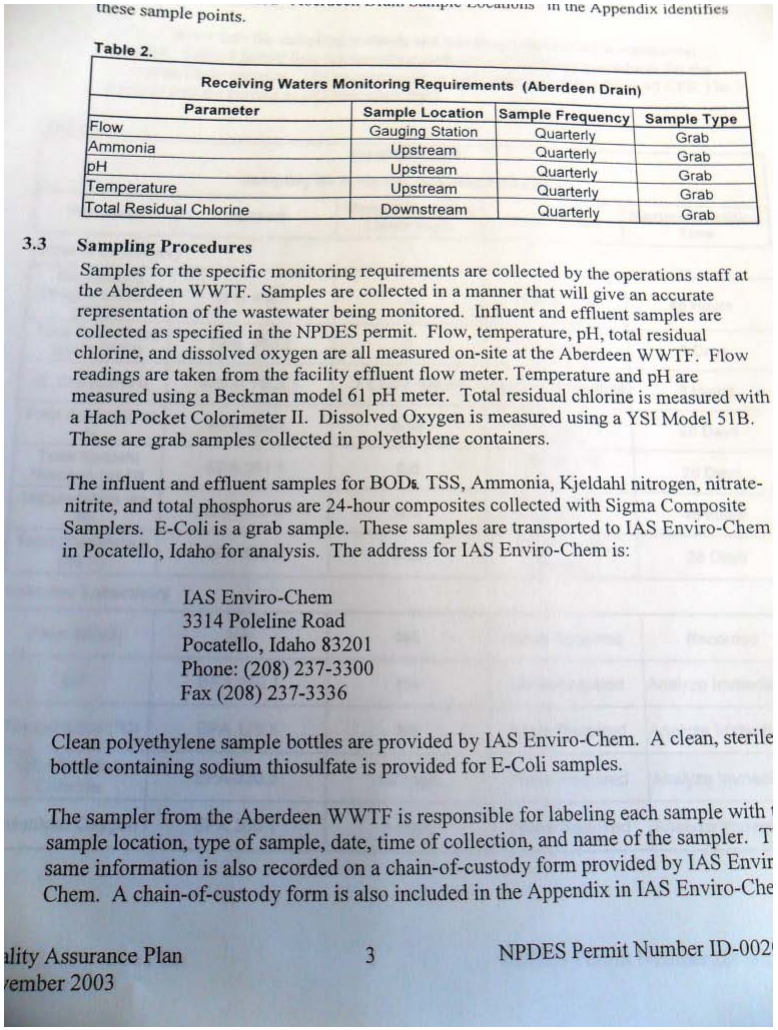
he following is a list of procedures to help ensure that the data used is accurate:

- Verify proper collection and preservation of samples.
- Verify that samples are collected at the required frequency.
- Verify that samples analyzed on-site are analyzed immediately.
- Verify that samples are transported to Intermountain Analytical Services as soon as possible so that samples can be analyzed within the required holding times.
- Verify that approved test methods are used when required.
- Check instrument calibration.
- Repeat analysis if there are doubts about accuracy.
- Repeat analysis if samples are not analyzed within the required holding times.
- Record an explanation, if possible, for any results that are out of range.
- Verify that there are not transcription or calculation errors.

Enviro-Chem has implemented their own in-house Quality Assurance Plan to ensure lytical results are accurate, reliable, and traceable. A copy of IAS Enviro-Chem's QAP is uded in the Appendix.

INTERNAL QUALITY CONTROL CHECKS

Photograph by David Domingo (EPA) on March 12, 2012 looking at Table 3 of the QAP. Note the sample preservation is not consistent with the most recent EPA approved methods (i.e. $\leq 6°$ for NH_3 and pH < 2 in addition to H_2SO_4).



these sample points.

Table 2.

Receiving Waters Monitoring Requirements (Aberdeen Drain)			
Parameter	**Sample Location**	**Sample Frequency**	**Sample Type**
Flow	Gauging Station	Quarterly	Grab
Ammonia	Upstream	Quarterly	Grab
pH	Upstream	Quarterly	Grab
Temperature	Upstream	Quarterly	Grab
Total Residual Chlorine	Downstream	Quarterly	Grab

3.3 Sampling Procedures

Samples for the specific monitoring requirements are collected by the operations staff at the Aberdeen WWTF. Samples are collected in a manner that will give an accurate representation of the wastewater being monitored. Influent and effluent samples are collected as specified in the NPDES permit. Flow, temperature, pH, total residual chlorine, and dissolved oxygen are all measured on-site at the Aberdeen WWTF. Flow readings are taken from the facility effluent flow meter. Temperature and pH are measured using a Beckman model 61 pH meter. Total residual chlorine is measured with a Hach Pocket Colorimeter II. Dissolved Oxygen is measured using a YSI Model 51B. These are grab samples collected in polyethylene containers.

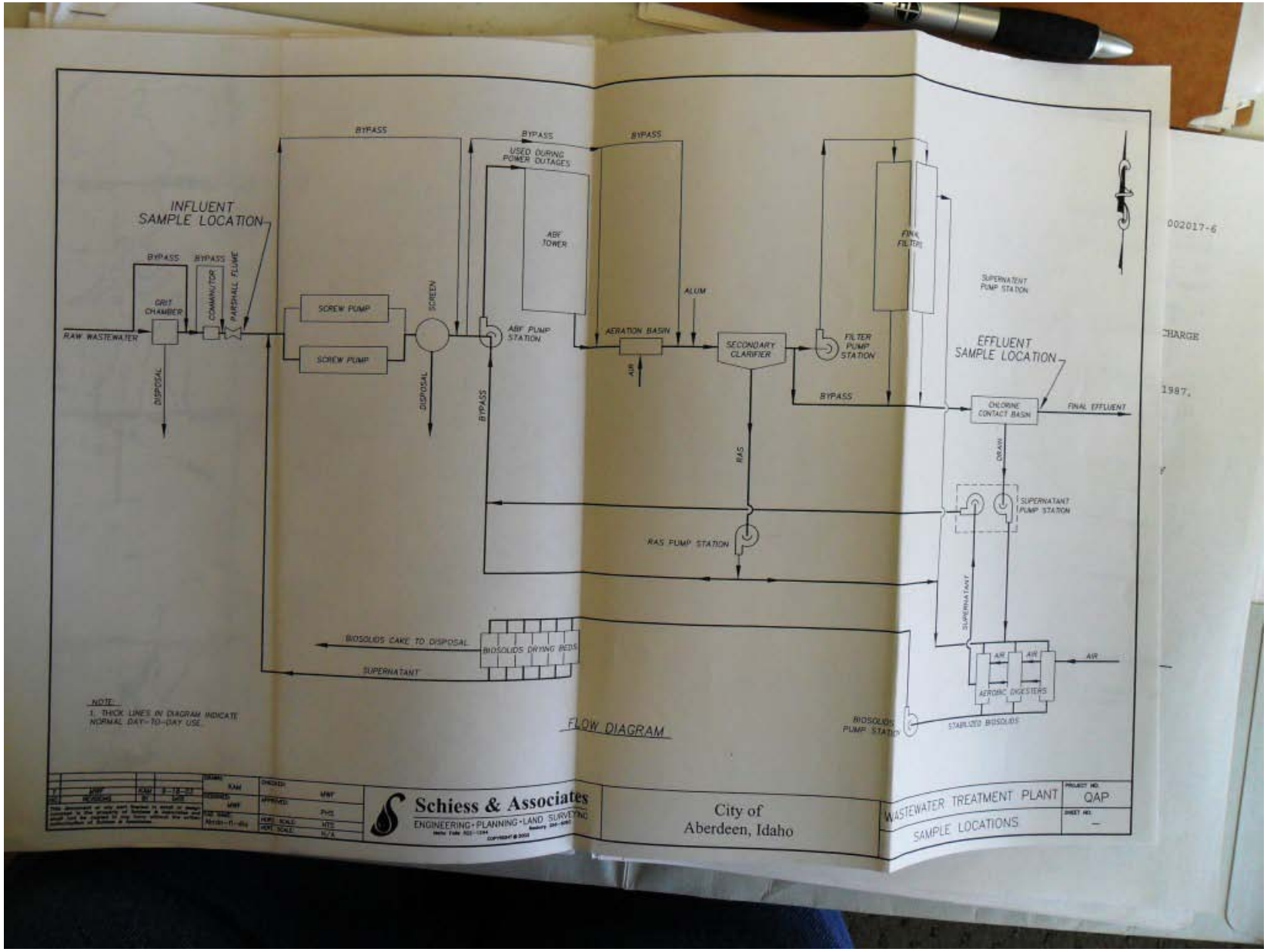
The influent and effluent samples for BOD5, TSS, Ammonia, Kjeldahl nitrogen, nitrate-nitrite, and total phosphorus are 24-hour composites collected with Sigma Composite Samplers. E-Coli is a grab sample. These samples are transported to IAS Enviro-Chem in Pocatello, Idaho for analysis. The address for IAS Enviro-Chem is:

IAS Enviro-Chem
3314 Poleline Road
Pocatello, Idaho 83201
Phone: (208) 237-3300
Fax (208) 237-3336

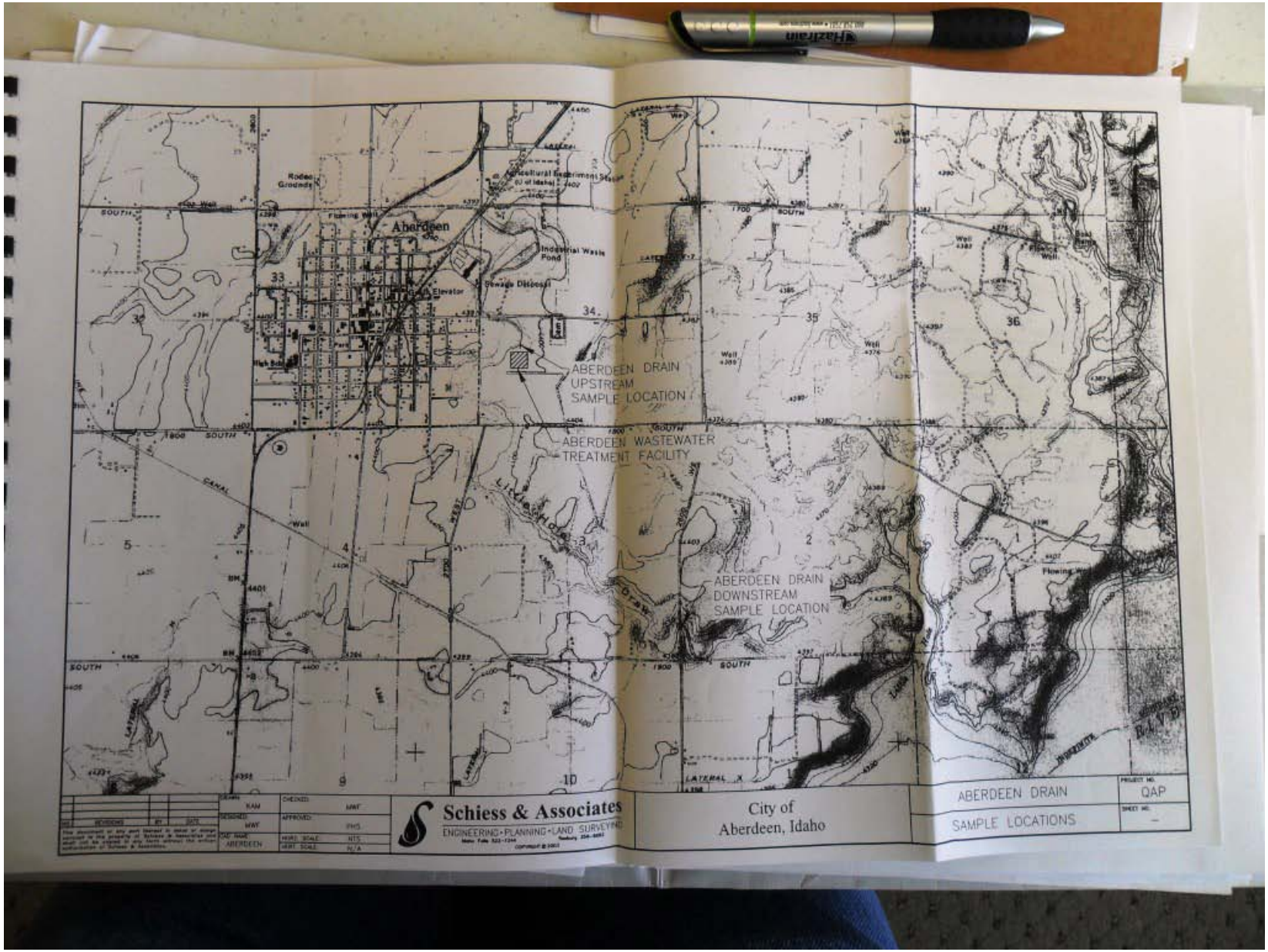
Clean polyethylene sample bottles are provided by IAS Enviro-Chem. A clean, sterile bottle containing sodium thiosulfate is provided for E-Coli samples.

The sampler from the Aberdeen WWTF is responsible for labeling each sample with sample location, type of sample, date, time of collection, and name of the sampler. T same information is also recorded on a chain-of-custody form provided by IAS Envir Chem. A chain-of-custody form is also included in the Appendix in IAS Enviro-Che

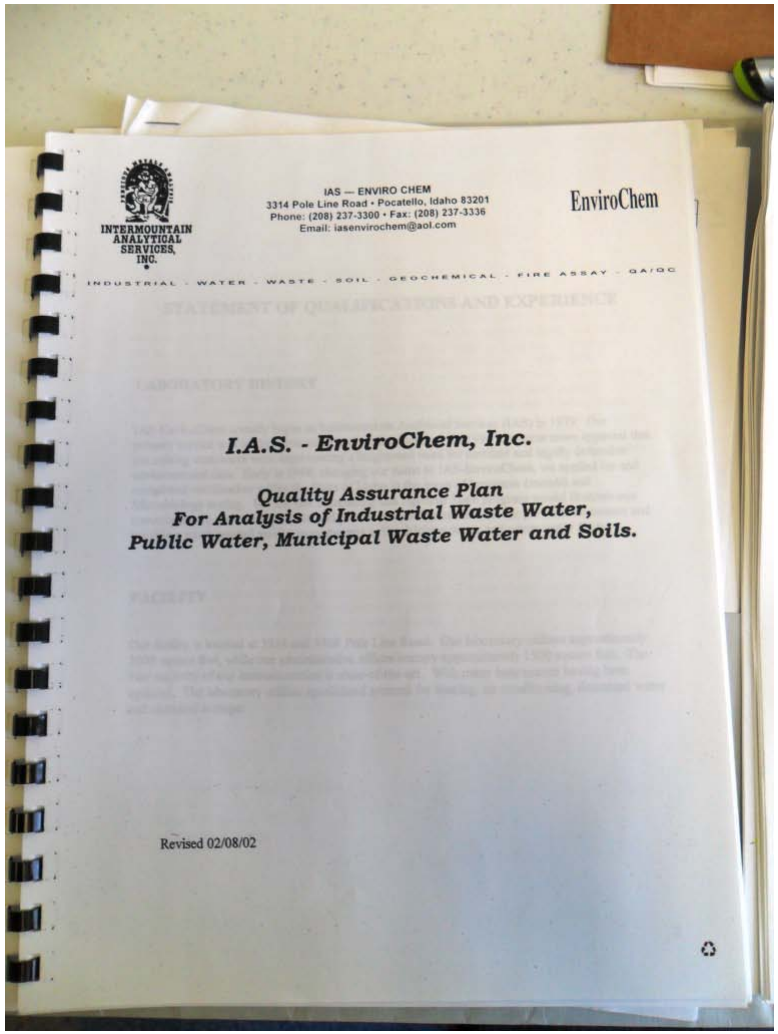
Photograph by David Domingo (EPA) on March 12, 2012 looking at sampling procedures specified the QAP.



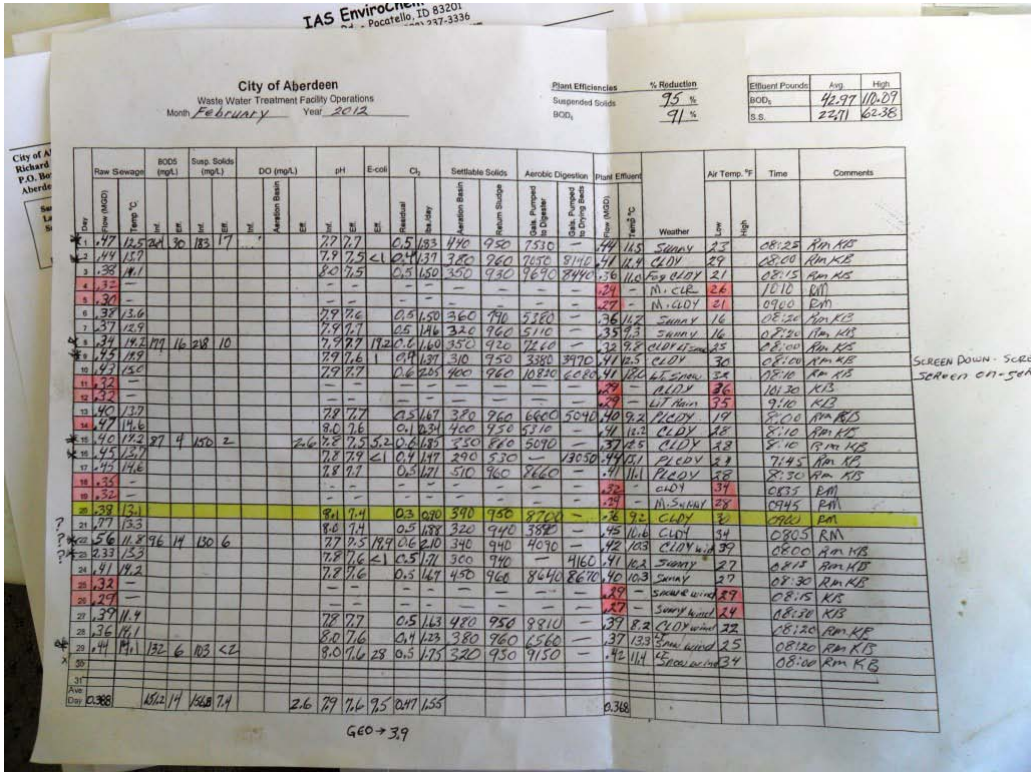
Photograph by David Domingo (EPA) on March 12, 2012 looking at the process flow diagram which indicates the influent and effluent monitoring locations at the Facility.



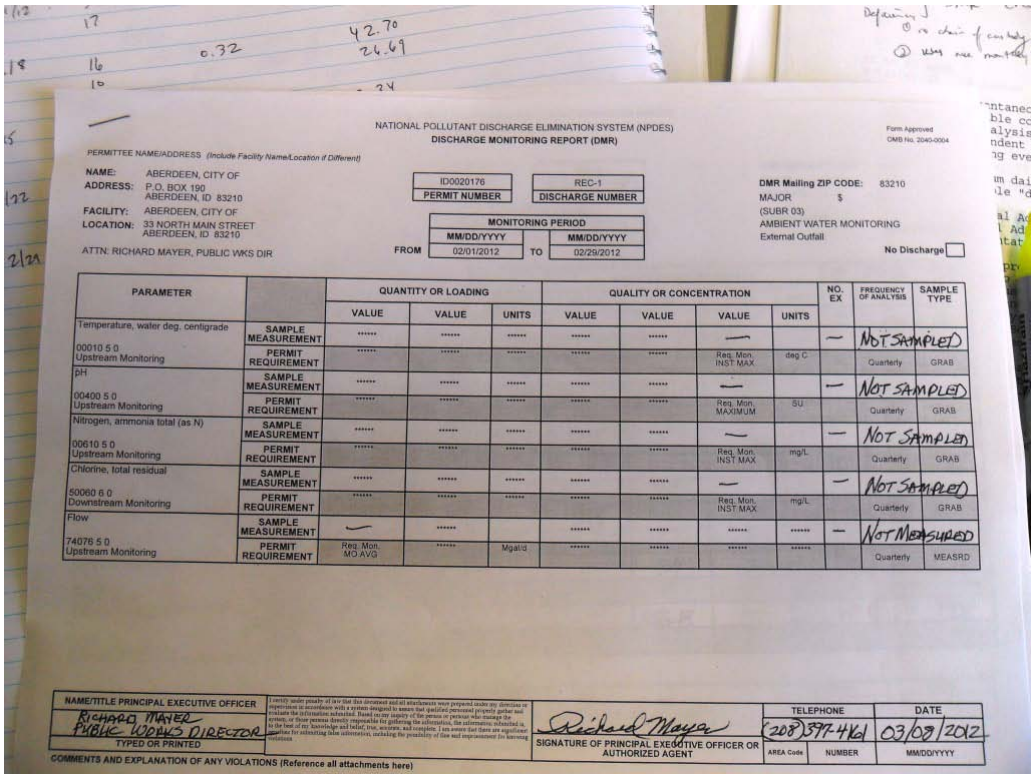
Photograph by David Domingo (EPA) on March 12, 2012 looking at the map indicating the receiving water monitoring locations.



Photograph by David Domingo (EPA) on March 12, 2012 looking at the QAP for the City's contract lab, IAS EnviroChem, Inc.



Photograph by David Domingo (EPA) on March 12, 2012 looking at the operator's log book for February 2012.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: ABERDEEN, CITY OF
ADDRESS: P.O. BOX 190 ABERDEEN, ID 83210
FACILITY: ABERDEEN, CITY OF
LOCATION: 33 NORTH MAIN STREET ABERDEEN, ID 83210
ATTN: RICHARD MAYER, PUBLIC WKS DIR

ID0020176 PERMIT NUMBER | REC-1 DISCHARGE NUMBER

MONITORING PERIOD: FROM 02/01/2012 (MM/DD/YYYY) TO 02/29/2012 (MM/DD/YYYY)

DMR Mailing ZIP CODE: 83210
MAJOR $
(SUBR 03)
AMBIENT WATER MONITORING
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Temperature, water deg. centigrade	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
00010 5 0 Upstream Monitoring	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. INST MAX	deg C		Quarterly	GRAB
pH	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
00400 5 0 Upstream Monitoring	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MAXIMUM	SU		Quarterly	GRAB
Nitrogen, ammonia total (as N)	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
00610 5 0 Upstream Monitoring	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. INST MAX	mg/L		Quarterly	GRAB
Chlorine, total residual	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
50060 6 0 Downstream Monitoring	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. INST MAX	mg/L		Quarterly	GRAB
Flow	SAMPLE MEASUREMENT	—	******		******	******	******	******	—	NOT MEASURED	
74076 5 0 Upstream Monitoring	PERMIT REQUIREMENT	Req. Mon. MO AVG	******	Mgal/d	******	******	******	******		Quarterly	MEASRD

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
RICHARD MAYER PUBLIC WORKS DIRECTOR
TYPED OR PRINTED

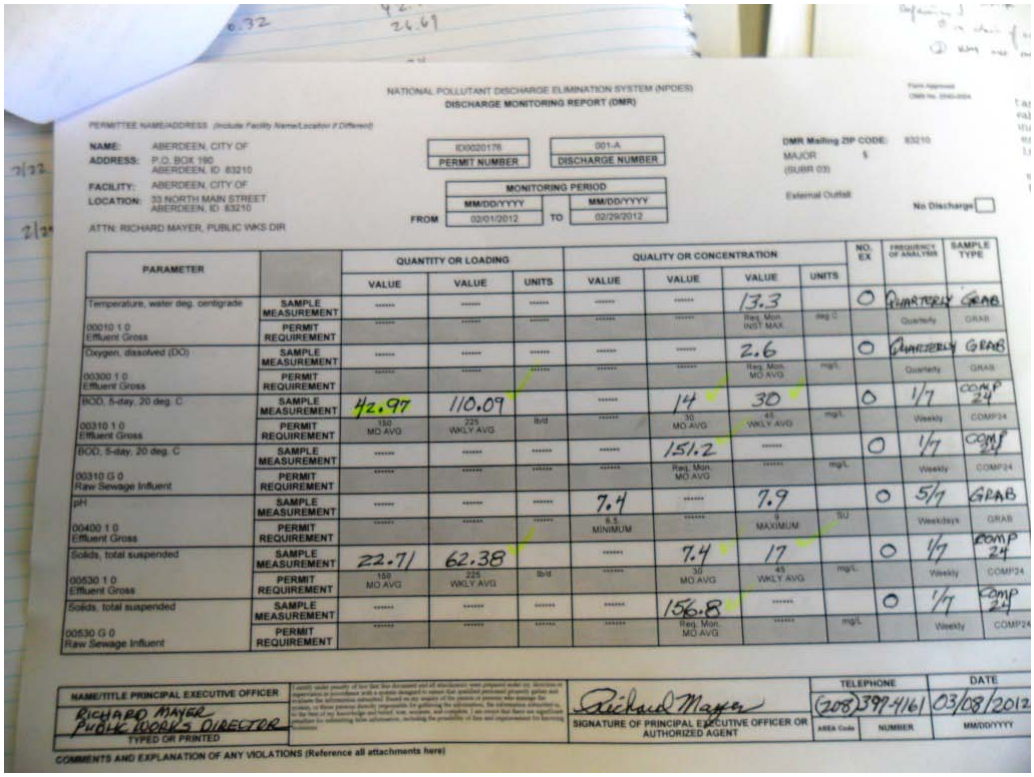
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: Richard Maya

TELEPHONE: (208) 397-4161 (AREA Code / NUMBER)
DATE: 03/08/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Photograph by David Domingo (EPA) on March 12, 2012 looking at the February 2012 DMR for receiving water monitoring results.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: ABERDEEN, CITY OF
ADDRESS: P.O. BOX 190 ABERDEEN, ID 83210
FACILITY: ABERDEEN, CITY OF
LOCATION: 33 NORTH MAIN STREET ABERDEEN, ID 83210
ATTN: RICHARD MAYER, PUBLIC WKS DIR

ID0020176 PERMIT NUMBER | 001-A DISCHARGE NUMBER

MONITORING PERIOD: FROM 02/01/2012 (MM/DD/YYYY) TO 02/29/2012

DMR Mailing ZIP CODE: 83210
MAJOR $
(SUBR 03)
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Temperature, water deg. centigrade	SAMPLE MEASUREMENT	******	******	******	******	******	13.3		0	QUARTERLY	GRAB
00010 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. INST MAX	deg C		Quarterly	GRAB
Oxygen, dissolved (DO)	SAMPLE MEASUREMENT	******	******	******	******	******	2.6		0	QUARTERLY	GRAB
00300 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******		******	******	Req. Mon. MO AVG	mg/L		Quarterly	GRAB
BOD, 5-day, 20 deg. C	SAMPLE MEASUREMENT	42.97	110.09	lb/d	******	14	30	mg/L	0	1/7	COMP 24
00310 1 0 Effluent Gross	PERMIT REQUIREMENT	150 MO AVG	225 WKLY AVG		******	30 MO AVG	45 WKLY AVG			Weekly	COMP24
BOD, 5-day, 20 deg. C	SAMPLE MEASUREMENT	******	******	******	******	151.2	******	mg/L	0	1/7	COMP 24
00310 G 0 Raw Sewage Influent	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	******			Weekly	COMP24
pH	SAMPLE MEASUREMENT	******	******	******	7.4	******	7.9		0	5/7	GRAB
00400 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	6.5 MINIMUM	******	MAXIMUM	SU		Weekdays	GRAB
Solids, total suspended	SAMPLE MEASUREMENT	22.71	62.38		******	7.4	17		0	1/7	COMP 24
00530 1 0 Effluent Gross	PERMIT REQUIREMENT	150 MO AVG	225 WKLY AVG	lb/d	******	30 MO AVG	45 WKLY AVG	mg/L		Weekly	COMP24
Solids, total suspended	SAMPLE MEASUREMENT	******	******	******	******	156.8	******		0	1/7	COMP 24
00530 G 0 Raw Sewage Influent	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	******	mg/L		Weekly	COMP24

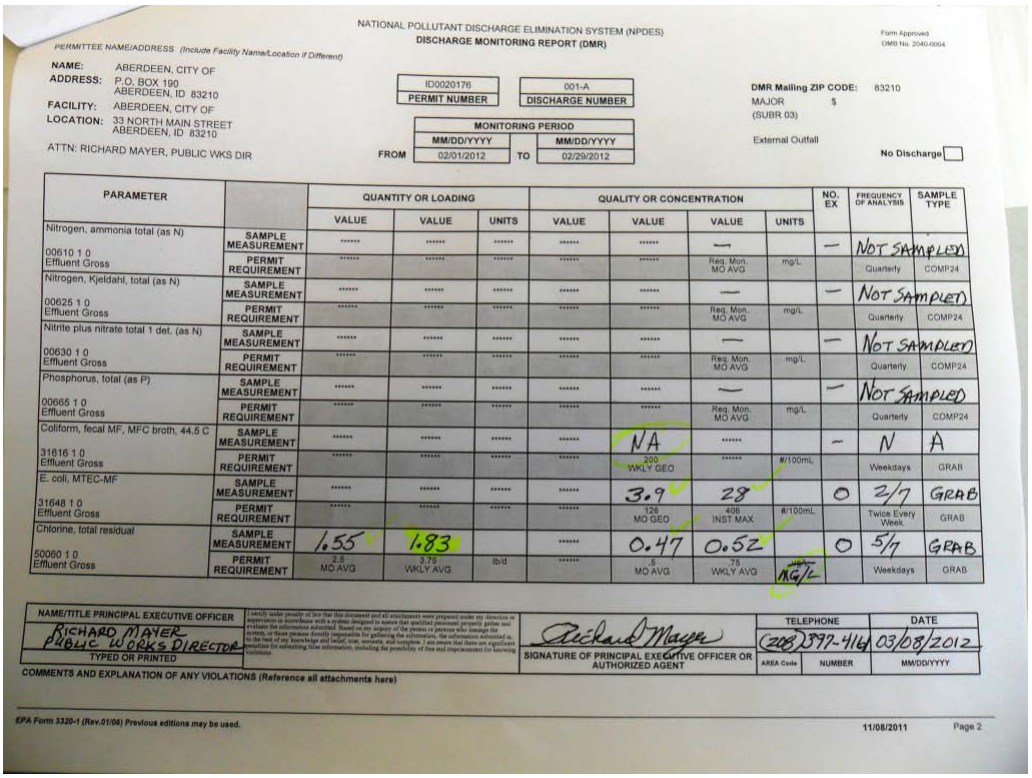
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
RICHARD MAYER PUBLIC WORKS DIRECTOR
TYPED OR PRINTED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: Richard Maya

TELEPHONE: (208) 397-4161 (AREA Code / NUMBER)
DATE: 03/08/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Photograph by David Domingo (EPA) on March 12, 2012 looking at the February 2012 DMR. Note the City used the average monthly flow of 0.368 mgd to calculate the average monthly loadings for BOD and TSS instead of using the corresponding flow on the day sampling occurred.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME: ABERDEEN, CITY OF
ADDRESS: P.O. BOX 190 ABERDEEN, ID 83210
FACILITY: ABERDEEN, CITY OF
LOCATION: 33 NORTH MAIN STREET ABERDEEN, ID 83210
ATTN: RICHARD MAYER, PUBLIC WKS DIR

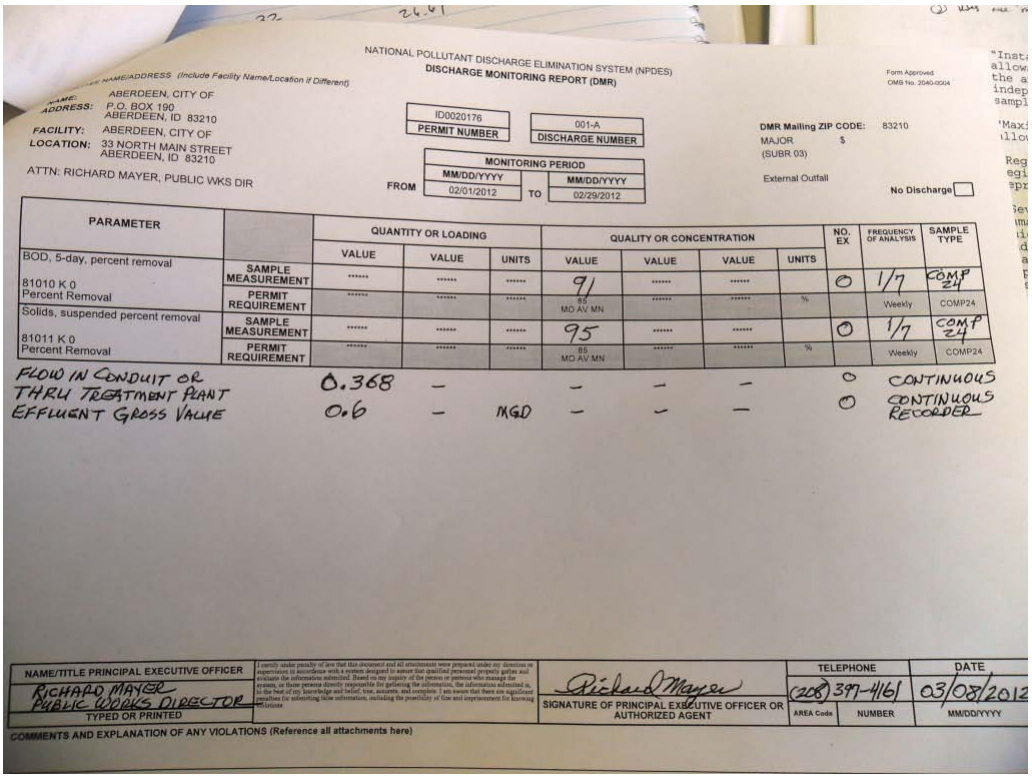
ID0020176 PERMIT NUMBER | 001-A DISCHARGE NUMBER
DMR Mailing ZIP CODE: 83210
MAJOR $
(SUBR 03)
External Outfall
No Discharge ☐
MONITORING PERIOD FROM MM/DD/YYYY 02/01/2012 TO MM/DD/YYYY 02/29/2012

PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Nitrogen, ammonia total (as N) 00610 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Nitrogen, Kjeldahl, total (as N) 00625 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Nitrite plus nitrate total 1 det. (as N) 00630 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Phosphorus, total (as P) 00665 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	******	—		—	NOT SAMPLED	
	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Coliform, fecal MF, MFC broth, 44.5 C 31616 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	NA	******		—	N	A
	PERMIT REQUIREMENT	******	******	******	******	200 WKLY GEO	******	#/100mL		Weekdays	GRAB
E. coli, MTEC-MF 31648 1 0 Effluent Gross	SAMPLE MEASUREMENT	******	******	******	******	3.9	28		0	2/7	GRAB
	PERMIT REQUIREMENT	******	******	******	******	126 MO GEO	406 INST MAX	#/100mL		Twice Every Week	GRAB
Chlorine, total residual 50060 1 0 Effluent Gross	SAMPLE MEASUREMENT	1.55	1.83		******	0.47	0.52		0	5/7	GRAB
	PERMIT REQUIREMENT	2.5 MO AVG	3.75 WKLY AVG	lb/d	******	.5 MO AVG	.75 WKLY AVG	mg/L		Weekdays	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: RICHARD MAYER PUBLIC WORKS DIRECTOR (TYPED OR PRINTED)
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: Richard Mayer
TELEPHONE: (208) 397-4164 (AREA Code / NUMBER)
DATE: 03/08/2012 (MM/DD/YYYY)
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

EPA Form 3320-1 (Rev.01/06) Previous editions may be used. 11/08/2011 Page 2

Photograph by David Domingo (EPA) on March 12, 2012 looking at the February 2012 DMR. Note the preprinted DMR includes fecal coliform monitoring and limit. The DMR is not consistent with Table 1 of the final permit (see photo above). Also, the City did not calculate the weekly average correctly.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved OMB No. 2040-0004

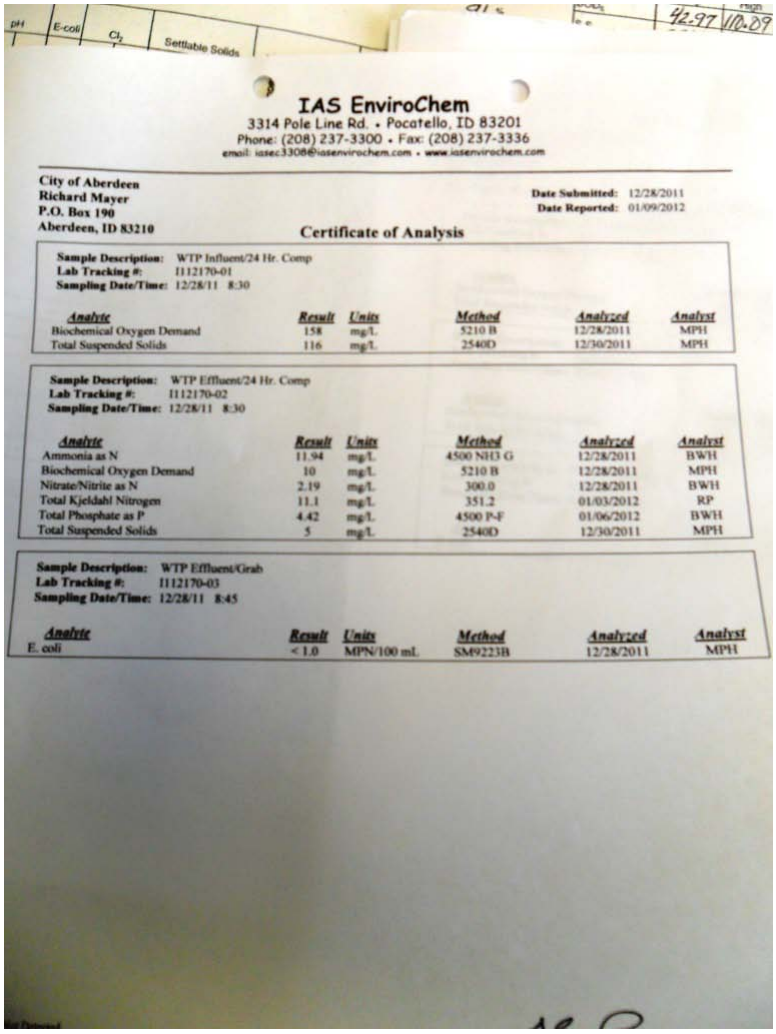
ABERDEEN, CITY OF
P.O. BOX 190 ABERDEEN, ID 83210
FACILITY: ABERDEEN, CITY OF
LOCATION: 33 NORTH MAIN STREET ABERDEEN, ID 83210
ATTN: RICHARD MAYER, PUBLIC WKS DIR

ID0020176 PERMIT NUMBER | 001-A DISCHARGE NUMBER
DMR Mailing ZIP CODE: 83210
MAJOR $
(SUBR 03)
External Outfall
No Discharge ☐
MONITORING PERIOD FROM MM/DD/YYYY 02/01/2012 TO MM/DD/YYYY 02/29/2012

PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
BOD, 5-day, percent removal 81010 K 0 Percent Removal	SAMPLE MEASUREMENT	******	******	******	91	******	******		0	1/7	COMP 24
	PERMIT REQUIREMENT	******	******	******	85 MO AV MN	******	******	%		Weekly	COMP24
Solids, suspended percent removal 81011 K 0 Percent Removal	SAMPLE MEASUREMENT	******	******	******	95	******	******		0	1/7	COMP 24
	PERMIT REQUIREMENT	******	******	******	85 MO AV MN	******	******	%		Weekly	COMP24
FLOW IN CONDUIT OR THRU TREATMENT PLANT		0.368	—		—	—	—		0	CONTINUOUS	
EFFLUENT GROSS VALUE		0.6	—	MGD	—	—	—		0	CONTINUOUS RECORDER	

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: RICHARD MAYER PUBLIC WORKS DIRECTOR (TYPED OR PRINTED)
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: Richard Mayer
TELEPHONE: (208) 397-4161 (AREA Code / NUMBER)
DATE: 03/08/2012 (MM/DD/YYYY)
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Photograph by David Domingo (EPA) on March 12, 2012 looking at the February 2012 DMR. Note the City reports flow on the DMR. According to Mr. Mayer, the City reported average monthly flow (i.e. 0.368 mgd) and maximum daily flow (i.e. 0.6 mgd).



IAS EnviroChem
3314 Pole Line Rd. • Pocatello, ID 83201
Phone: (208) 237-3300 • Fax: (208) 237-3336
email: iasec3308@iasenvirochem.com • www.iasenvirochem.com

City of Aberdeen
Richard Mayer
P.O. Box 190
Aberdeen, ID 83210

Date Submitted: 12/28/2011
Date Reported: 01/09/2012

Certificate of Analysis

Sample Description: WTP Influent/24 Hr. Comp
Lab Tracking #: I112170-01
Sampling Date/Time: 12/28/11 8:30

Analyte	Result	Units	Method	Analyzed	Analyst
Biochemical Oxygen Demand	158	mg/L	5210 B	12/28/2011	MPH
Total Suspended Solids	116	mg/L	2540D	12/30/2011	MPH

Sample Description: WTP Effluent/24 Hr. Comp
Lab Tracking #: I112170-02
Sampling Date/Time: 12/28/11 8:30

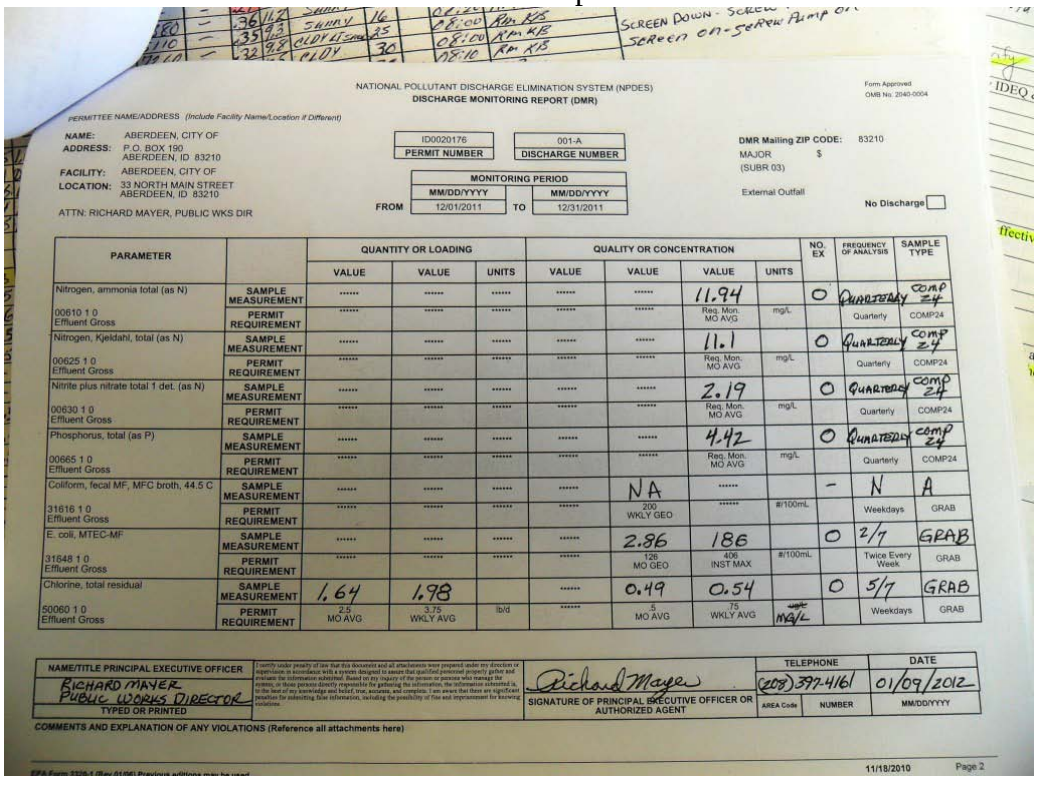
Analyte	Result	Units	Method	Analyzed	Analyst
Ammonia as N	11.94	mg/L	4500 NH3 G	12/28/2011	BWH
Biochemical Oxygen Demand	10	mg/L	5210 B	12/28/2011	MPH
Nitrate/Nitrite as N	2.19	mg/L	300.0	12/28/2011	BWH
Total Kjeldahl Nitrogen	11.1	mg/L	351.2	01/03/2012	RP
Total Phosphate as P	4.42	mg/L	4500 P-F	01/06/2012	BWH
Total Suspended Solids	5	mg/L	2540D	12/30/2011	MPH

Sample Description: WTP Effluent/Grab
Lab Tracking #: I112170-03
Sampling Date/Time: 12/28/11 8:45

Analyte	Result	Units	Method	Analyzed	Analyst
E. coli	< 1.0	MPN/100 mL	SM9223B	12/28/2011	MPH

Photograph by David Domingo (EPA) on March 12, 2012 looking at the certificate of analysis for influent and effluent samples collected on December 28, 2011. Note the City monitored and reported the quarterly results for those parameters specified in Table 1 of the permit.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the December 2011 DMR. Note the City monitored and reported the quarterly results for those parameters specified in Table 1 of the permit.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
Form Approved. OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME: ABERDEEN, CITY OF
ADDRESS: P.O. BOX 190, ABERDEEN, ID 83210
FACILITY: ABERDEEN, CITY OF
LOCATION: 33 NORTH MAIN STREET, ABERDEEN, ID 83210
ATTN: RICHARD MAYER, PUBLIC WKS DIR

ID0020176 PERMIT NUMBER | 001-A DISCHARGE NUMBER
DMR Mailing ZIP CODE: 83210
MAJOR (SUBR 03) $
External Outfall
No Discharge ☐
MONITORING PERIOD FROM 12/01/2011 TO 12/31/2011

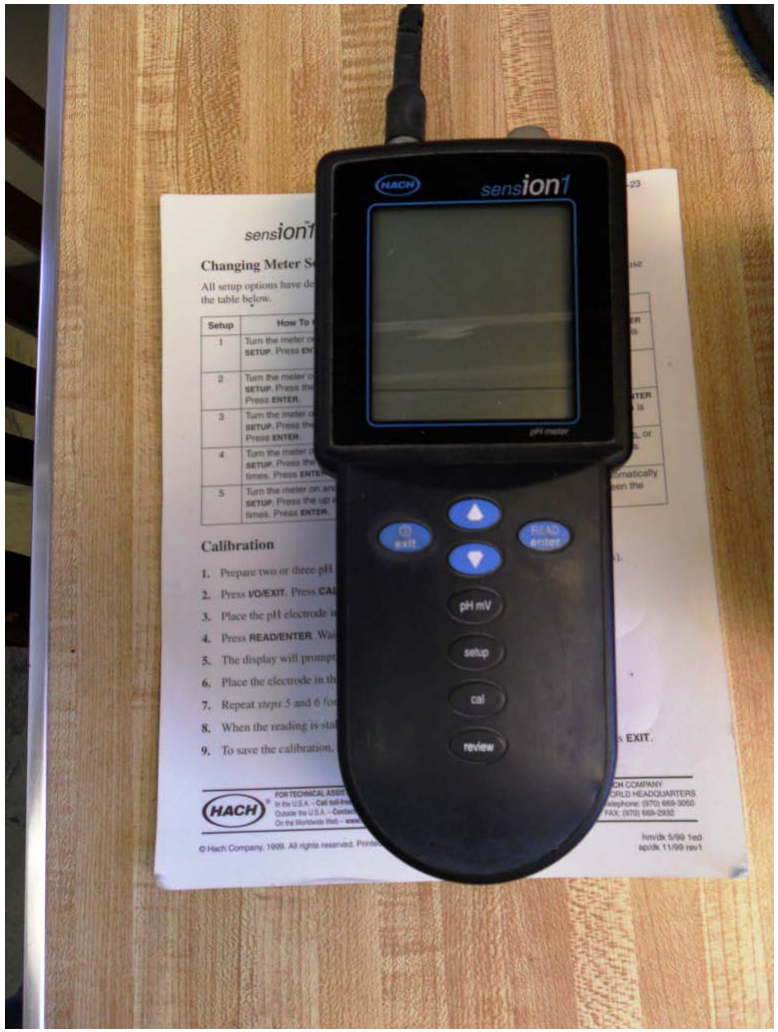
PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, ammonia total (as N)	SAMPLE MEASUREMENT	******	******	******	******	******	11.94		O	QUARTERLY	COMP 24
00610 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Nitrogen, Kjeldahl, total (as N)	SAMPLE MEASUREMENT	******	******	******	******	******	11.1		O	QUARTERLY	COMP 24
00625 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Nitrite plus nitrate total 1 det. (as N)	SAMPLE MEASUREMENT	******	******	******	******	******	2.19		O	QUARTERLY	COMP 24
00630 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Phosphorus, total (as P)	SAMPLE MEASUREMENT	******	******	******	******	******	4.42		O	QUARTERLY	COMP 24
00665 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. MO AVG	mg/L		Quarterly	COMP24
Coliform, fecal MF, MFC broth, 44.5 C	SAMPLE MEASUREMENT	******	******	******	******	NA	******		-	N	A
31616 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	200 WKLY GEO	******	#/100mL		Weekdays	GRAB
E. coli, MTEC-MF	SAMPLE MEASUREMENT	******	******	******	******	2.86	186		O	2/7	GRAB
31648 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	126 MO GEO	406 INST MAX	#/100mL		Twice Every Week	GRAB
Chlorine, total residual	SAMPLE MEASUREMENT	1.64	1.98		******	0.49	0.54		O	5/7	GRAB
50060 1 0 Effluent Gross	PERMIT REQUIREMENT	2.5 MO AVG	3.75 WKLY AVG	lb/d	******	.5 MO AVG	.75 WKLY AVG	mg/L		Weekdays	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE	DATE
RICHARD MAYER PUBLIC WORKS DIRECTOR (TYPED OR PRINTED)	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	Richard Mayer	(208) 397-4161 (AREA Code / NUMBER)	01/09/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

EPA Form 3320-1 (Rev 01/06) Previous editions may be used. 11/18/2010 Page 2

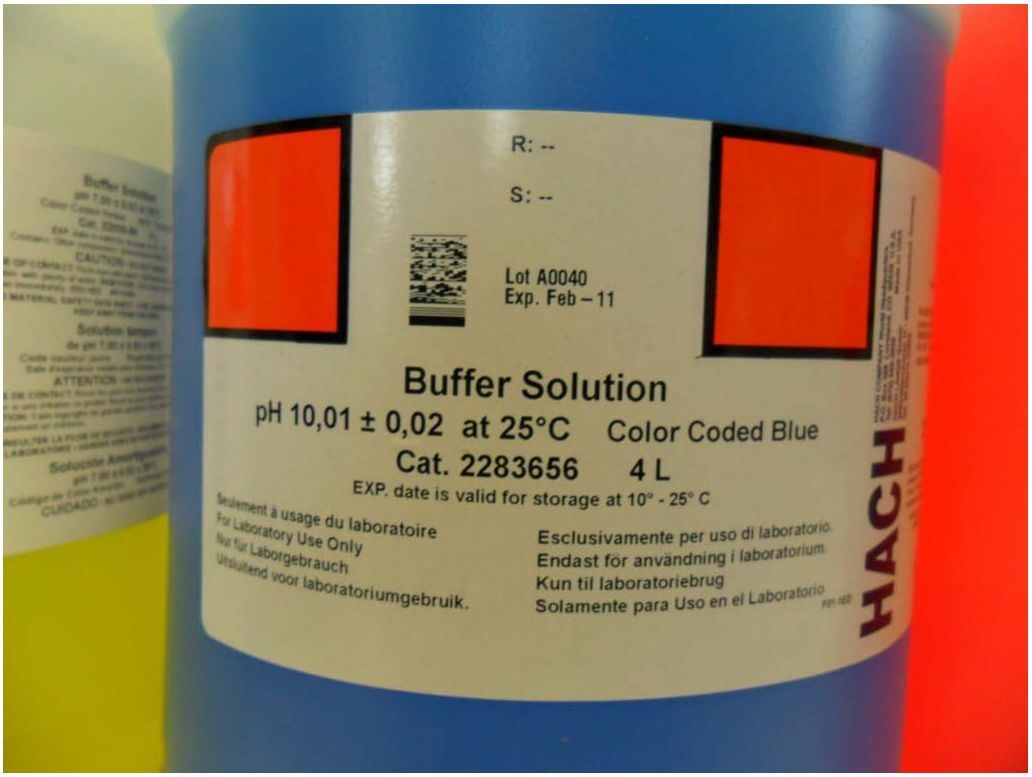
Photograph by David Domingo (EPA) on March 12, 2012 looking at a photo of construction during the last facility upgrade in 1991. The photo is located at the current Facility.



Photograph by David Domingo (EPA) on March 12, 2012 looking at the pH meter for the Facility.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the probe for the pH meter.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the pH 7.0 buffer used to calibrate the meter. Note the expiration date of February 2012.



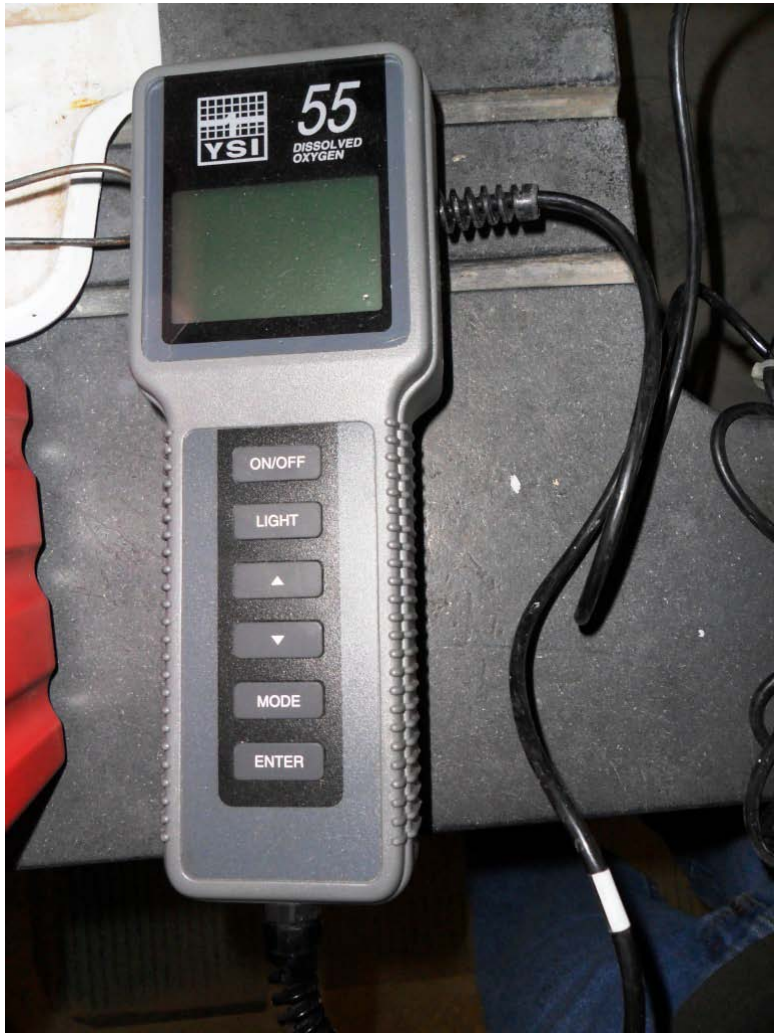
Photograph by David Domingo (EPA) on March 12, 2012 looking at the pH 10.0 buffer used to calibrate the meter. Note the expiration date of February 2011.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the pH 4.0 buffer used to calibrate the meter. Note the lot number A0040 and expiration date of February 2014.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the pH 4.0 buffer used to calibrate the meter. Note the lot number A7351 and expiration date of December 2011.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the total residual chlorine (TRC) meter for the Facility.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the total residual chlorine (TRC) meter for the Facility.

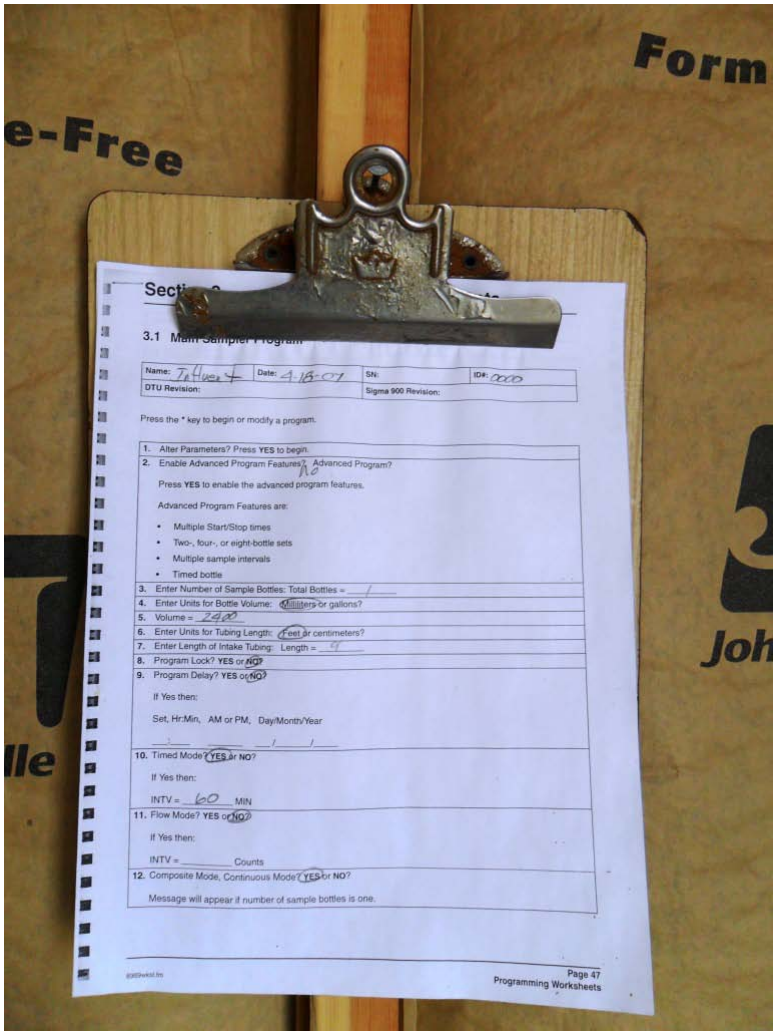


Photograph by David Domingo (EPA) on March 12, 2012 looking at the dissolved oxygen meter for the Facility.

Photograph by David Domingo (EPA) on March 12, 2012 looking at wastewater as it enters the Facility. Influent passes through the comminutor and then to the influent flow and sampling location. According to Mr. Mayer, flow can be diverted around the comminutor through the manual bar screen if necessary.

Photograph by David Domingo (EPA) on March 12, 2012 looking south at the influent flow and sampling location. Wastewater flows from the comminutor through this location to the screw pumps located in the background (top of photo).

Photograph by David Domingo (EPA) on March 12, 2012 looking at the Sigma 900 composite influent sampler. According to Mr. Mayer, the sampler is programmed to take ~ 100-150 ml every hour.



Photograph by David Domingo (EPA) on March 12, 2012 looking at the recording sheet for the influent sampler. Note the sheet does not identify the sample preservation temperature.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the influent sampler. According to Mr. Mayer, the samplers are refrigerator during collection and the temperature is monitored using the thermometer.

Photograph by David Domingo (EPA) on March 12, 2012 looking south at the two screw pumps. Wastewater flows from this unit to the fine screen.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the two screw pumps. Wastewater flows from this unit to the fine screen.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the fine screen. Solids from the unit are handled by the county and disposed of with the municipal solid waste. Wastewater flows from the screen to the wet well inside the building and then pumped to the ABF tower.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the ABF tower. Wastewater flows from the tower to the same wet well located inside the adjacent building.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the wet well. Wastewater flows from the screen to the wet well and then pumped to the top of the ABF tower. Wastewater from the ABF tower returns to a different compartment of the wet well where it is pumped to the aeration basins. According to Mr. Mayer, during high flows the wastewater from the ABF tower may exceed the capacity of the applicable compartment inside the wet well and mix with the wastewater being pumped to the top of the ABF tower.

Photograph by David Domingo (EPA) on March 12, 2012 looking west to north at the aeration basins. Wastewater flows from these basins to the secondary clarifier.

Photograph by David Domingo (EPA) on March 12, 2012 looking at one of the aeration basins. Wastewater flows from the basins to the secondary clarifier.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the secondary clarifier. Wastewater flows from the clarifier to the chlorine contact basin.

Photograph by David Domingo (EPA) on March 12, 2012 looking west at the chlorine contact basin. Wastewater flows from the basin to outfall 001. Effluent flow and sampling occur at the west end of the basin.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the effluent flow and sampling location at the west end of the basin.

Photograph by David Domingo (EPA) on March 12, 2012 looking at outfall 001. Wastewater flows from the chlorine contact basin and discharges to Aberdeen Drain through outfall 001.

Photograph by David Domingo (EPA) on March 12, 2012 looking at outfall 001. Wastewater flows from the chlorine contact basin and discharges to Aberdeen Drain through outfall 001.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the staff gauge within Aberdeen drain downstream of outfall 001. According to Mr. Mayer, the gauge is used to measure flow within the drain.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the 150 lb chlorine gas cylinders used to disinfect the wastewater. The gas is mixed with water and injected prior to the chlorine contact basin.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the scale used to monitor the 150 lb chlorine gas cylinder currently in use.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the 150 lb chlorine gas cylinders used to disinfect the wastewater. The gas is mixed with water and injected prior to the chlorine contact basin.

Photograph by David Domingo (EPA) on March 12, 2012 looking at the control panel for the Facility.

ATTACHMENT C

Status Report

City of Aberdeen, Idaho
Wastewater Treatment Facility

(March 12, 2012 Inspection)

Facility Information	
Permit #	ID0020176
Name	City of Aberdeen
Mayor	Morgan Anderson
Mailing Address	PO Box 190 Aberdeen, ID 83210
Facility Address	2695 West 1750 South Aberdeen, ID 83210
Receiving water	Aberdeen Drain to American Falls Reservoir
Population	1,994
Previous Letters	December 15, 2004 NOV Concerning Inspection by IDEQ & DMRs
Permit Review	
Permit Signed	September 26, 2001
Permit Effective	September 26, 2001
Permit Expired	September 26, 2006
Expired?	
Re Application?	Received application September 13, 2006
New Permit/ Extended?	Admin Extended
EPA Response to Application	April 23, 2007 determined complete, permit will remain effective
Surface Water Monitoring Reports	
DMR Review	
DMR Review Date Range	March 2007 – December 2011
Signatory	Richard Mayer, Public Works Director is signed off on the Permit application received September 13, 2006 & DMRs [Do not have a letter of authorization on file]
Sludge Management Requirements	The permittee must ensure that an updated biosolids permit application (Form 2S) is on file with the EPA within six months of the issuance of this permit. Received May 17, 2002.
Missing DMRs	None
DMRs sent late	None

Data Entry Errors & Missing Info

Month	Parameter	Inputted	Limit	
3/2007	fecal	NA	200/100ml	Wkly Geo
4/2007	fecal	NA	200/100ml	Wkly Geo
5/2007	fecal	NA	200/100ml	Wkly Geo
6/2007	fecal	NA	200/100ml	Wkly Geo
7/2007	fecal	NA	200/100ml	Wkly Geo
8/2007	fecal	NA	200/100ml	Wkly Geo
9/2007	fecal	NA	200/100ml	Wkly Geo
10/2007	fecal	NA	200/100ml	Wkly Geo
11/2007	fecal	NA	200/100ml	Wkly Geo
12/2007	fecal	NA	200/100ml	Wkly Geo
1/2008	fecal	NA	200/100ml	Wkly Geo
2/2008	fecal	NA	200/100ml	Wkly Geo
3/2008	fecal	NA	200/100ml	Wkly Geo

4/2008	fecal	NA	200/100ml	Wkly Geo
5/2008	fecal	NA	200/100ml	Wkly Geo
6/2008	fecal	NA	200/100ml	Wkly Geo
7/2008	fecal	NA	200/100ml	Wkly Geo
8/2008	fecal	NA	200/100ml	Wkly Geo
9/2008	fecal	NA	200/100ml	Wkly Geo
10/2008	fecal	NA	200/100ml	Wkly Geo
11/2008	fecal	NA	200/100ml	Wkly Geo
12/2008	fecal	NA	200/100ml	Wkly Geo
1/2009	fecal	NA	200/100ml	Wkly Geo
2/2009	fecal	NA	200/100ml	Wkly Geo
3/2009	fecal	NA	200/100ml	Wkly Geo
4/2009	fecal	NA	200/100ml	Wkly Geo
5/2009	fecal	NA	200/100ml	Wkly Geo
6/2009	fecal	NA	200/100ml	Wkly Geo
7/2009	fecal	NA	200/100ml	Wkly Geo
8/2009	fecal	NA	200/100ml	Wkly Geo
9/2009	fecal	NA	200/100ml	Wkly Geo
10/2009	fecal	NA	200/100ml	Wkly Geo
11/2009	fecal	NA	200/100ml	Wkly Geo
12/2009	fecal	NA	200/100ml	Wkly Geo
1/2010	fecal	NA	200/100ml	Wkly Geo
2/2010	fecal	NA	200/100ml	Wkly Geo
3/2010	fecal	NA	200/100ml	Wkly Geo
4/2010	fecal	NA	200/100ml	Wkly Geo
5/2010	fecal	NA	200/100ml	Wkly Geo
6/2010	fecal	NA	200/100ml	Wkly Geo
7/2010	fecal	NA	200/100ml	Wkly Geo
8/2010	fecal	NA	200/100ml	Wkly Geo
9/2010	fecal	NA	200/100ml	Wkly Geo
10/2010	fecal	NA	200/100ml	Wkly Geo
11/2010	fecal	NA	200/100ml	Wkly Geo
12/2010	fecal	NA	200/100ml	Wkly Geo
1/2011	fecal	NA	200/100ml	Wkly Geo
2/2011	fecal	-	200/100ml	Wkly Geo
3/2011	fecal	NA	200/100ml	Wkly Geo
4/2011	fecal	-	200/100ml	Wkly Geo
5/2011	fecal	NA	200/100ml	Wkly Geo
6/2011	fecal	NA	200/100ml	Wkly Geo
7/2011	fecal	NA	200/100ml	Wkly Geo
8/2011	fecal	NA	200/100ml	Wkly Geo
9/2011	fecal	NA	200/100ml	Wkly Geo
10/2011	fecal	NA	200/100ml	Wkly Geo
11/2011	fecal	NA	200/100ml	Wkly Geo
12/2011	fecal	NA	200/100ml	Wkly Geo

DMRs within last 5 years	**121**

Flow on DMRs	Flows values written on DMRs – unclear if daily maximum and/or average monthly results.
Design Criteria	Design criterion is annual average flow of 0.6 mgd. Each month, permittee must compute annual average value for flow entering the facility based on previous 12 months.
REC quarterly (Temp, pH, Ammonia, TRC, flow)	2011: • 12/11 (unable to do any upstream sampling and/or measurement due to lack of flow), 9/11 (sampled), 6/11 (sampled), 3/11 (unable to do any upstream sampling and/or measurement due to lack of flow) 2010: • 12/10 (unable to do any upstream sampling and/or measurement due to lack of flow), 9/10 (sampled), 6/10 (sampled), 3/10 (unable to do any upstream sampling and/or measurement due to lack of flow) 2009: • 12/09 (unable to do any upstream sampling and/or measurement due to a lack of flow), 9/09 (sampled), 6/09, (sampled), 3/09 (unable to do any upstream sampling and/or measurement due to a lack of flow) 2008: • 12/08 (not measured due to lack of upstream flow), 9/08 (sampled), 6/08 (sampled), 3/08 (no upstream flow or receiving waters, unable to sample or measure) 2007: • 12/07 (could not sample or measure because of lack of upstream flow), 9/07 (sampled), 6/07 (sampled), 3/07 (no upstream flow in receiving waters to sample or measure)
001 A quarterly (Temp, DO, Ammonia, Kjeldahl, nitrite + nitrate, phosphorus)	• 2011: **12/11**, 11/11 (only temp & DO), 10/11 (only temp & DO), **9/11**, 8/11 (only temp & DO), 7/11 (only temp & DO), **6/11**, 5/11 (only temp & DO), 4/11 (only temp & DO), **3/11**, 2/11 (only temp & DO), 1/11 (only temp & DO) • 2010: **12/10,** 11/10 (only temp & DO), 10/10 (only temp & DO), **9/10**, 8/10 (only temp & DO), 7/10 (only temp & DO), **6/10**, 5/10 (only temp & DO), 4/10 (only temp & DO), **3/10**, 2/10 (only temp & DO), 1/10 (only temp & DO) • 2009: **12/09,** 11/09 (only temp & DO), 10/09 (only temp & DO), **9/09,** 8/09 (only temp & DO), 7/09 (only temp & DO), **6/09,** 5/09 (only temp & DO), 4/09 (only temp & DO), **3/09,** 2/09 (only temp & DO), 1/09 (only temp & DO) • 2008: **12/08,** 11/08 (only temp & DO), 10/08 (only temp & DO), **9/08,** 8/08 (only temp & DO), 7/08 (only temp & DO), **6/08,** 5/08 (only temp & DO), 4/08 (only temp & DO), **3/08**, 2/08 (only temp & DO), 1/08 (only temp & DO) • 2007: **12/07,** 11/07 (only temp & DO), 10/07 (only temp & DO), **9/07,** 8/07 (only temp & DO), 7/07 (only temp & DO), **6/07,** 5/07 (only temp & DO), 4/07 (only temp & DO), **3/07,** 2/07 (only temp & DO), 1/07 (only temp & DO)
Inspection Review	
Inspection Date	July 22, 2009
Inspector	Jennifer Wester
Inspected By	IDEQ
On Site Representative	Richard Mayer, Public Works Director (208) 397-4161 Justin Wilson, Wastewater Operator
Inspection Commentary	• Some of old structures were deteriorating • The influent grit box was not functioning at the time of the inspection

	• "the age of the system coupled with the facility consistently operating near or above the peak daily flow may be signs of an underperforming treatment plant" • Figure 8 shows a clarifier not functioning properly (signs of algae problems) • Figure 11 shows high turbidity in the plant effluent water • Taking efforts to upgrade plant

Month	Pollutant	Effluent Limitation	Value Reported in DMR	Limit Type
July 2007	TRC	0.50 mg/l	0.51 mg/l	Monthly Average
February 2008	TRC	0.50 mg/l	0.505 mg/l	Monthly Average
April 2008	TRC	0.50 mg/l	0.505 mg/l	Monthly Average
July 2009	E. coli	406 / 100ml	2,419 / 100ml	Instantaneous Maximum
July 2009	TRC	0.50 mg/l	0.51 mg/l	Monthly Average

Permit Violations: Effluent Limit Exceedances				
Month	**Pollutant**	**Effluent Limitation**	**Value Reported in DMR**	**Limit Type**
February 2008	TSS	30 mg/l	87.3 mg/l	Monthly Average
February 2008	TSS	45 mg/l	127 mg/l	Weekly Average
November 2008	TSS	220 lbs/day	257 lbs/day	Monthly Average
November 2008	TSS	330 lbs/day	620 lbs/day	Weekly Average
November 2008	TSS	30 mg/l	85.4 mg/l	Monthly Average
November 2008	TSS	45 mg/l	206 mg/l	Weekly Average
November 2008	TSS	85%	75.9%	Monthly Average